

Child Protection and Safeguarding Policy
St Mary's Catholic Primary School



Reviewed: September 2026

Love, Listen and Learn

Mission Statement

St. Mary's school community follows the teachings of Jesus Christ, working together to develop the whole child, in a spiritual, moral, academic, physical, social and emotional way, within a caring and supportive environment.

Ethos

We recognise that there is a challenge in creating an enriching environment for all those involved at every level of school life. We take our lead and inspiration from Christ with regard to the Gospel values: the belief that all human beings are uniquely created and loved by God and worthy of respect. This challenge manifests itself in the way that we treat and value:

- Our relationships with each other and the wider community
- Our respect for one another
- Our welcome to and interest in all those who visit our school
- Discipline inspired by forgiveness, healing and reconciliation
- Our school environment

Through rising to this challenge, we aim to create an awareness of a sense of belonging to and being part of the life of St Mary's.

The Aims of our School

We will endeavour to create a Catholic Ethos in our school, which reflects the Gospel values, through the love, care and respect we show to each other, and to all who come to our school. We will teach the beliefs, traditions and practices of the Catholic Faith.

Through the prayer and worship in school we will try to be a living community of people celebrating their love for God and one another.

We believe the quality of the curriculum, with Religious Education at its core, is of prime importance and will focus on the development of the whole child. We will at all times try to make provision for children with special needs, so that all members of our school community achieve their potential.

We will help the children to develop an awareness of and respect for other religious and cultural backgrounds, as we believe this to be an essential preparation for adult life.

We believe that good communication between governors, staff, parents and children is important for the wellbeing of our school, and we will work in partnership with the wider community especially the home and parish in developing each child's potential.

The Aims for Each Child at St Mary's Catholic Primary School

- ◆ Whilst at St. Mary's School I will learn about being a Christian. I will experience the beliefs, traditions and practices of the Catholic Faith.
- ◆ I will achieve as much as I possibly can in each area of the National Curriculum.
- ◆ I will know how to learn and enjoy learning, and will view work in a positive and conscientious manner.
- ◆ I will co-operate and communicate with others effectively, independently and in a group, and try to win and lose graciously.
- ◆ I will tolerate and respect the religious beliefs, views and values of others, understand the need for good behaviour and moderate my behaviour accordingly. I will respect the belongings and property of others.
- ◆ If I have a problem I know I can find someone who will discuss it with me.
- ◆ I will try to learn from my mistakes and accept there is always room for improvement.
- ◆ I will share a sense of responsibility for my school, parish, local community and the wider environment.

Introduction

Our safeguarding policy cannot be separated from the general ethos of the school, which is to ensure that pupils/students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to. The governors and staff of St. Mary's Catholic primary school fully recognise the contribution it makes to safeguarding children. We recognise that all members of staff, including volunteers, have a full and active part to play in protecting our pupils from harm. All staff and Governors believe that our school should provide a caring, positive safe and stimulating environment which promotes the social, physical and moral development of the individual child.

Contents

Important contacts	3
1. Aims.....	Error! Bookmark not defined.
2. Legislation and statutory guidance	Error! Bookmark not defined.
3. Definitions	Error! Bookmark not defined.
4. Equality statement	6
5. Roles and responsibilities.....	Error! Bookmark not defined.
6. Confidentiality.....	Error! Bookmark not defined.
7. Recognising abuse and taking action	Error! Bookmark not defined.
8. Online safety and the use of mobile technology	24
9. Notifying parents or carers	Error! Bookmark not defined.
10. Pupils with special educational needs, disabilities or health issues	27
11. Pupils with a social worker.....	28

Love, Listen and Learn

12. Looked-after and previously looked-after children	28
13. Complaints and concerns about school safeguarding policies	Error! Bookmark not defined.
14. Record-keeping	30
15. Training	Error! Bookmark not defined.
16. Monitoring arrangements.....	Error! Bookmark not defined.
17. Links with other policies.....	32
Appendix 1: types of abuse	
Appendix 2: safer recruitment and DBS checks – policy and procedures	
Appendix 3: allegations of abuse made against staff	
Appendix 4: specific safeguarding issues	

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Claire Brennan	020 8804 2396
Deputy DSL	Nicolina Falzone and Rosheen Martin	020 8804 2396
Interim Headteacher	Rosheen Martin	020 8804 2396
Local authority designated officer (LADO)	Cathy Phelan	020 8379 2850/ 020 8379 4392
Chair of governors	Wendy Allen	020 8804 2396
Channel helpline		020 7340 7264

1. Aims

The school aims to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote the welfare of children;
- all staff are aware of their statutory responsibilities in relation to safeguarding and child protection;
- all staff receive appropriate safeguarding and child protection training, including online safety, and are able to recognise and respond appropriately to signs of abuse, neglect and exploitation;
- all staff know how to report safeguarding concerns and understand the procedures they must follow;
- pupils are taught how to keep themselves and others safe, including online, in an age-appropriate manner; and
- the school adopts a child-centred and co-ordinated approach to safeguarding, in which the best interests of the child are always a primary consideration.

2. Legislation and statutory guidance

This policy has been prepared in accordance with the Department for Education's statutory guidance:

- *Keeping Children Safe in Education 2026* ("KCSIE 2026"), which comes into force on 1 September 2026;
- *Working Together to Safeguard Children 2026*;
- the *Maintained schools: governance guide*; and

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- the statutory framework for the Early Years Foundation Stage.

The school has regard to this statutory guidance and complies with the local safeguarding arrangements agreed and published by the three safeguarding partners: the local authority, the integrated care board and the police.

This policy is also based on the following legislation and statutory requirements:

- **Section 175 of the Education Act 2002**, which places a duty on governing bodies of maintained schools and local authorities to make arrangements to safeguard and promote the welfare of children;
- **The Education (School Teachers' Appraisal) (England) Regulations 2012**, where relevant to the management of safeguarding-related professional responsibilities;
- **The School Staffing (England) Regulations 2009**, which set out requirements relating to safer recruitment, including the information that must be recorded on the single central record and the requirement for at least one person conducting an interview to have completed safer recruitment training;
- **The Children Act 1989**, which provides the legislative framework for the care and protection of children;
- **The Children Act 2004**, as amended by the Children and Social Work Act 2017, which places duties on key agencies to work together to safeguard and promote the welfare of children and establishes the arrangements for local safeguarding partners;
- **The Children and Social Work Act 2017**, which makes provision for safeguarding partners and child safeguarding practice reviews;
- **Section 5B(11) of the Female Genital Mutilation Act 2003**, as inserted by section 74 of the Serious Crime Act 2015, which places a mandatory duty on teachers to report personally to the police where, in the course of their professional duties, they discover that an act of female genital mutilation appears to have been carried out on a girl under the age of 18;
- **Multi-agency statutory guidance on female genital mutilation**, which sets out the responsibilities of agencies involved in safeguarding and supporting girls and women affected by, or at risk of, female genital mutilation;
- **The Rehabilitation of Offenders Act 1974**, the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and associated legislation, which set out when convictions and cautions must be disclosed and the circumstances in which individuals with criminal records may work with children;
- **The Safeguarding Vulnerable Groups Act 2006**, including Schedule 4, which defines regulated activity relating to children and provides the legal framework for barring individuals who pose a risk of harm;
- **The Protection of Freedoms Act 2012**, which amended the Safeguarding Vulnerable Groups Act 2006 and established the Disclosure and Barring Service;
- **The Counter-Terrorism and Security Act 2015**, particularly section 26, which places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism;
- **The Prevent duty guidance for England and Wales**, which explains how schools must discharge their duties under the Counter-Terrorism and Security Act 2015;
- **The Human Rights Act 1998**, which incorporates the rights set out in the European Convention on Human Rights into UK law. Being subjected to harassment, violence or abuse, including abuse of a sexual nature, may breach a child's rights under the Act;
- **The Equality Act 2010**, including the Public Sector Equality Duty, which requires the school to have due regard to the need to:
 - eliminate discrimination, harassment, victimisation and other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - foster good relations between people who share a protected characteristic and those who do not;

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- **The Public Sector Equality Duty**, under section 149 of the Equality Act 2010, which supports the school in identifying and responding to safeguarding inequalities and patterns of disproportionality. The school recognises that some children may be more vulnerable to harm because of their protected characteristics or individual circumstances. This may include risks relating to sexual violence and harassment, misogyny, racism, homophobic, biphobic or transphobic bullying, or discrimination relating to disability or religion or belief;
- **The Domestic Abuse Act 2021**, which recognises children as victims of domestic abuse where they see, hear or experience the effects of the abuse and are related to, or under the parental responsibility of, the victim or perpetrator;
- **The Marriage and Civil Partnership (Minimum Age) Act 2022**, which raised the minimum age of marriage and civil partnership in England and Wales to 18 and made it an offence to cause a child to enter into a marriage;
- **The Forced Marriage (Civil Protection) Act 2007** and relevant provisions of the Anti-social Behaviour, Crime and Policing Act 2014, which provide protection and criminal sanctions in relation to forced marriage;
- **The Data Protection Act 2018** and the UK General Data Protection Regulation, which govern the processing and sharing of personal information. The school recognises that data protection law does not prevent the sharing of information for the purposes of keeping children safe;
- **The Childcare Act 2006** and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, referred to in this policy as the “2018 Childcare Disqualification Regulations”, which set out the circumstances in which a person may be disqualified from providing relevant childcare or being directly concerned in its management;
- **The Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018**, which identify schools as relevant agencies that may be required to co-operate with local safeguarding arrangements; and
- **The statutory framework for the Early Years Foundation Stage**, including its safeguarding and welfare requirements.

In applying the Equality Act 2010, the governing body and headteacher will carefully consider how the school supports pupils who share protected characteristics. The school will make reasonable adjustments for disabled pupils and may take proportionate positive action where evidence indicates that a particular group of pupils experiences a specific disadvantage or a disproportionate safeguarding risk. The school recognises that children may not feel ready or know how to tell someone that they are being abused, neglected or exploited. They may also not recognise their experiences as harmful. This will not prevent staff from maintaining professional curiosity and speaking to the designated safeguarding lead where they have concerns about a child.

Local safeguarding arrangements

The school’s safeguarding procedures comply with the arrangements, thresholds, protocols and procedures published by the **Enfield Safeguarding Children Partnership (ESCP)**. The three statutory safeguarding partners in Enfield are:

- the London Borough of Enfield;
- NHS North Central London Integrated Care Board; and
- the Metropolitan Police Service.

The school understands its role as a relevant agency within the local safeguarding arrangements. The governing body, headteacher, designated safeguarding lead and deputy designated safeguarding leads will make themselves aware of, and act in accordance with, the published local arrangements, including the local criteria for action and local protocols for assessment.

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The school will co-operate with the safeguarding partners, local authority children's social care, the police, health services and other relevant agencies. It will provide information when lawfully requested and contribute to assessments, Family Help arrangements, child protection processes and multi-agency plans.

The school follows the **London Safeguarding Children Procedures, 8th Edition**, including all subsequent updates and amendments. These procedures are updated periodically, and the school will ensure that it refers to the most recent online version rather than relying on a previously downloaded or printed copy.

London Safeguarding Children Procedures:

<https://www.londonsafeguardingchildrenprocedures.co.uk/>

3. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education 2026 as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing the 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; and
- taking action to enable all children to have the best outcomes.

Safeguarding is everyone's responsibility. The school adopts a child-centred approach and recognises that the best interests of the child are always paramount. All staff should consider, at all times, what is in the best interests of the child.

Child protection is part of safeguarding and promoting the welfare of children. It refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. This includes harm occurring inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by an adult or adults or by another child or children. Abuse may occur in person, online or through a combination of both. Appendix 1 explains the different forms 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 provides further detail about neglect.

The school recognises that safeguarding concerns can include abuse, neglect, exploitation and other safeguarding issues. Children may be vulnerable to multiple forms of abuse and exploitation simultaneously.

Sharing of nudes and semi-nudes (previously referred to as sexting or youth-produced sexual imagery) refers to the sharing of nude or semi-nude images, videos or live streams by children. This includes computer-generated or artificially generated images (pseudo-images) that appear to be photographs or videos. The school will manage incidents in accordance with the guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people and KCSIE 2026.

Children includes everyone under the age of 18.

The three statutory safeguarding partners, as defined by the Children Act 2004 (as amended by the Children and Social Work Act 2017) and referenced throughout Keeping Children Safe in Education 2026, are:

- the local authority;
- the Integrated Care Board (ICB); and
- the chief officer of police for the local authority area.

These safeguarding partners work together to safeguard and promote the welfare of children by publishing and implementing local safeguarding arrangements, including local thresholds, procedures and protocols for protecting children.

The school also recognises the role of relevant agencies, including schools, in supporting the local safeguarding arrangements and working effectively with safeguarding partners, children's social care, health services, the police and other agencies.

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The term victim is widely understood and recognised. However, the school recognises that not everyone who has experienced abuse considers themselves a victim or wishes to be described in that way. The school will use the terminology that the child feels is most appropriate while ensuring that safeguarding concerns are responded to effectively. Similarly, the terms alleged perpetrator and perpetrator are widely recognised. However, staff will carefully consider the language used, particularly when speaking with children, recognising that in some circumstances children who display harmful behaviour may themselves have experienced abuse, neglect or trauma. Appropriate terminology will be determined on a case-by-case basis, taking account of the needs and best interests of all children involved.

4. Equality statement

Some children have an increased risk of abuse, neglect, exploitation and other safeguarding concerns, and additional barriers may exist for some children in recognising, reporting or disclosing abuse. We are committed to anti-discriminatory practice and recognise that every child has different experiences and needs. We ensure that all children receive the same high standard of protection, regardless of any protected characteristic, vulnerability or barrier they may face.

We recognise that children may experience multiple and intersecting vulnerabilities, and that these can increase their risk of harm. Staff will remain professionally curious and consider each child's individual circumstances when identifying, assessing and responding to safeguarding concerns.

We give particular consideration to children who:

- have special educational needs and/or disabilities (SEND) or health conditions (see Section 10);
- are young carers;
- may experience discrimination because of their race, ethnicity, culture, religion or belief, sex, disability or other protected characteristic;
- are lesbian, gay or bisexual, are questioning their gender, or may be perceived by others to be LGBT. We recognise that the fact that a child may be LGBT is not in itself an inherent risk factor for harm; however, children can be targeted by others because of their perceived or actual sexual orientation or gender identity;
- have English as an additional language;
- are known to be living in difficult circumstances, including temporary accommodation, poverty, parental substance misuse, domestic abuse, parental mental ill health or parental offending;
- are at risk of child criminal exploitation (CCE), child sexual exploitation (CSE), serious violence, county lines involvement, female genital mutilation (FGM), forced marriage, honour-based abuse, radicalisation or other forms of exploitation;
- are asylum seekers, refugees or have uncertain immigration status;
- are at risk because of their own or a family member's mental health needs;
- are looked after, previously looked after or are living in kinship care arrangements (see Section 12);
- are persistently absent from education, missing education or have experienced repeated suspensions or exclusions;
- have experienced abuse, neglect, domestic abuse or trauma;
- have a social worker, are receiving Family Help, Child in Need or Child Protection support, or have previously received statutory safeguarding support; or
- whose parent or carer has expressed an intention to remove them from school to educate them otherwise than at school (elective home education).

The governing body and all staff recognise that safeguarding incidents and behaviours may be associated with factors outside the school, including those occurring online. Staff will be alert to the additional needs of vulnerable children and will ensure that appropriate support, early intervention and multi-agency working are put in place to safeguard and promote their welfare.

The school will not tolerate discrimination, harassment or victimisation and will ensure that safeguarding arrangements are applied fairly, consistently and without prejudice. Reasonable adjustments will be made where necessary to ensure that children with disabilities or additional needs can access support and protection on an equal basis with their peers.

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5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, governors and trustees (where applicable) working in or on behalf of the school and is consistent with the arrangements of the three statutory safeguarding partners. Our safeguarding arrangements also apply to all extended school provision, before and after-school activities, educational visits and any activities delivered off site. The school plays a crucial role in preventative education. This forms part of a whole-school approach to safeguarding and preparing pupils for life in modern Britain, underpinned by a strong safeguarding culture and an environment in which abuse, discrimination, harassment, sexual violence and sexual harassment are never tolerated or dismissed as "banter", "part of growing up" or "just having a laugh".

This approach is supported through our:

- Behaviour Policy;
- Relationships and Behaviour Policy (where applicable);
- Staff Code of Conduct;
- Online Safety Policy;
- Pastoral support systems;
- Personal Development curriculum; and
- planned programme of Relationships Education, Relationships and Sex Education (RSE) and Health Education, which is inclusive, age appropriate and delivered regularly.

Our curriculum helps pupils to understand:

- healthy, respectful and positive relationships;
- personal boundaries and consent;
- respect, equality and protected characteristics;
- stereotypes, discrimination and prejudice;
- body confidence and self-esteem;
- online relationships and online safety;
- how to recognise abusive, exploitative or unhealthy relationships, including coercive and controlling behaviour;
- the concepts of, and laws relating to, sexual consent, child sexual exploitation, child criminal exploitation, abuse, grooming, coercion, harassment, stalking, sexual violence, rape, domestic abuse, so-called honour-based abuse (including forced marriage and female genital mutilation), modern slavery and exploitation; and
- what constitutes sexual harassment and sexual violence, why these behaviours are always unacceptable, and how to seek help and report concerns.

5.1 All staff

All staff have a responsibility to safeguard children and to act in the best interests of every child. Staff who work directly with children are expected to read Part One and Annex B of the Department for Education's statutory guidance, *Keeping Children Safe in Education (2026)*. Staff who do not work directly with children will receive safeguarding and child protection information appropriate to their role and responsibilities, as determined by the headteacher and designated safeguarding lead (DSL). All staff will:

- read and understand Part One and Annex B of *Keeping Children Safe in Education (2026)*;
- receive safeguarding and child protection training (including online safety) at induction;
- receive safeguarding updates, including updates to KCSIE, at least annually and whenever required;
- sign a declaration at the beginning of each academic year confirming that they have read and understood the current safeguarding guidance and this policy; and
- understand their individual safeguarding responsibilities and know how to respond appropriately to concerns.

All staff will:

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- reinforce the importance of online safety when communicating with parents and carers, including making parents aware of the online platforms, websites and digital resources children are expected to use;
- understand the school's filtering and monitoring arrangements and their role in keeping children safe online;
- foster an inclusive environment where every child feels safe, respected and able to share concerns;
- ensure that children who are lesbian, gay, bisexual or questioning their gender feel able to speak to a trusted adult if they have worries or concerns.

All staff will be aware of:

- the school's safeguarding systems, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, the Behaviour Policy, the Online Safety Policy (including filtering and monitoring responsibilities), the identity and role of the designated safeguarding lead (DSL) and deputy DSL(s), and the school's procedures for responding to children who are missing education;
- local safeguarding arrangements, thresholds for intervention and referral pathways;
- the Family Help process (formerly Early Help) and their role in identifying emerging needs, working with the DSL and contributing to multi-agency support where appropriate;
- the process for making referrals to children's social care, the police and other agencies, and the statutory assessments that may follow;
- what to do if they identify a safeguarding concern or a child discloses abuse, neglect or exploitation, including maintaining appropriate confidentiality and never promising to keep secrets;
- the indicators of all forms of abuse, neglect and exploitation, including domestic abuse, sexual abuse, emotional abuse, physical abuse, neglect, child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, serious violence, modern slavery, trafficking, female genital mutilation (FGM), forced marriage, so-called honour-based abuse, radicalisation and online abuse;
- the impact of domestic abuse, including controlling or coercive behaviour and parental conflict that is frequent, intense and unresolved;
- new and emerging safeguarding risks, including those associated with artificial intelligence, online platforms, grooming, sexual exploitation, criminal exploitation, misinformation, disinformation and evolving technology;
- the importance of listening to children, taking all concerns seriously and reassuring children that they will be supported and kept safe;
- that safeguarding incidents and behaviours can occur both inside and outside school, inside and outside the home, and online;
- that children who are, or who are perceived to be, lesbian, gay or bisexual, or who are questioning their gender, may be more vulnerable to bullying, discrimination or abuse, although these characteristics are not themselves safeguarding risks;
- that children and families may experience multiple and interacting needs, and that professional curiosity is essential in identifying risk;
- the importance of early identification, information sharing and effective multi-agency working; and
- what to look for in identifying children who may need help, protection or additional support.

All staff should recognise that children may not feel ready, or know how, to tell someone they are being abused, neglected or exploited. They may also not recognise that what they are experiencing is harmful. This should not prevent staff from maintaining professional curiosity, speaking with the designated safeguarding lead and taking appropriate action where they have concerns.

Section 15 and Appendix 4 of this policy provide further guidance on how staff are supported to fulfil these responsibilities.

5.2 The Designated Safeguarding Lead (DSL)

Designated Safeguarding Staff at St Mary's Catholic Primary School

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There is a duty on all staff to share any safeguarding concerns about a child immediately. If you are concerned that a child may be at risk of harm, abuse, neglect or exploitation, you must speak to one of the following designated safeguarding leads without delay.

Name	Role
Mrs Claire Brennan	Designated Safeguarding Lead (DSL) – Acting Assistant Headteacher
Mrs Rosheen Martin	Deputy Designated Safeguarding Lead – Interim Headteacher
Mrs Nicolina Falzone	Deputy Designated Safeguarding Lead – Acting Assistant Headteacher

The Designated Safeguarding Lead (DSL), **Mrs Claire Brennan**, is a member of the senior leadership team and has lead responsibility for safeguarding and child protection across the school. During term time, the DSL will be available during school hours to discuss safeguarding concerns with staff. Appropriate arrangements are also in place to ensure that safeguarding advice and support are available outside normal school hours for activities organised by the school where required. When the DSL is unavailable, one of the deputy designated safeguarding leads will carry out the functions of the role. While the activities of the DSL may be delegated appropriately to trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the Designated Safeguarding Lead. The governing body will ensure that the DSL and deputy DSLs are provided with sufficient time, funding, supervision, training, resources and support to carry out their duties effectively.

The DSL will:

- provide advice, guidance and support to staff on safeguarding and child protection matters;
- promote a strong safeguarding culture throughout the school;
- manage referrals to Children's Social Care, Family Help services, the Police, the Channel Programme, the Disclosure and Barring Service (DBS) and other relevant agencies where appropriate;
- support staff who make referrals directly;
- work closely with the local authority, safeguarding partners and other agencies to ensure effective multi-agency working;
- contribute to strategy discussions, child protection conferences, core groups, Family Help meetings and other multi-agency meetings;
- support the assessment of children and their families;
- ensure that safeguarding records are accurate, confidential, securely stored and transferred appropriately when pupils move schools;
- maintain oversight of children with Child Protection Plans, Child in Need Plans, Family Help support and children with social workers;
- monitor patterns of attendance, behaviour and welfare which may indicate safeguarding concerns;
- ensure that all safeguarding concerns are recorded appropriately and acted upon promptly;
- ensure staff receive appropriate safeguarding advice, training and updates;
- maintain an appropriate level of professional knowledge through regular safeguarding training in accordance with KCSIE 2026;
- understand the school's filtering and monitoring systems and work with the relevant members of staff to ensure these remain effective;
- maintain a good understanding of online safety, emerging technologies and associated safeguarding risks, including artificial intelligence where relevant;
- have a good understanding of child-on-child abuse and harmful sexual behaviour and ensure appropriate responses are in place;
- understand local safeguarding arrangements, thresholds for intervention and referral pathways.

The DSL will also:

- keep the headteacher informed of safeguarding issues and concerns while maintaining appropriate confidentiality;

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- provide regular safeguarding reports to the governing body, ensuring that individual children cannot be identified;
- liaise with the local authority designated officer (LADO) where concerns relate to adults working with children;
- liaise with children's social care, health professionals, the police and other safeguarding partners as appropriate;
- ensure the school's policies appropriately reflect local arrangements relating to sexual violence and sexual harassment;
- know what specialist local support services are available for victims, children displaying harmful behaviour and their families, and understand how these services can be accessed;
- ensure that children are appropriately supported throughout any police investigation, including ensuring that an appropriate adult is provided where required;
- encourage a child-centred approach to safeguarding in which the views, wishes and feelings of children are heard and acted upon;
- ensure that safeguarding remains a standing item within the school's strategic leadership arrangements.

The full responsibilities of the Designated Safeguarding Lead and deputy designated safeguarding leads are detailed within their job descriptions and reflect the statutory responsibilities set out in *Keeping Children Safe in Education 2026*.

5.3 The Governing Board

The governing board has strategic leadership responsibility for safeguarding and child protection and will ensure that safeguarding arrangements are effective, child centred and fully compliant with statutory guidance.

The governing board will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of policy development, school improvement, strategic planning and school life;
- ensure that safeguarding is embedded within the school's culture and that children are taught how to keep themselves safe, including online;
- evaluate and approve this policy at each review, ensuring that it complies with current legislation and statutory guidance, and hold the headteacher to account for its effective implementation;
- understand and discharge its responsibilities under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), data protection legislation and the local multi-agency safeguarding arrangements;
- appoint a safeguarding link governor to monitor the effectiveness of safeguarding arrangements in conjunction with the governing board. The safeguarding link governor will not be the Designated Safeguarding Lead (DSL);
- ensure that all staff, including governors, receive appropriate safeguarding and child protection training (including online safety), that safeguarding updates are provided regularly, and that training reflects local safeguarding arrangements and advice from the safeguarding partners;
- ensure that appropriate filtering and monitoring systems are in place to safeguard children when accessing the school's IT systems and that these arrangements are regularly reviewed for effectiveness;
- ensure that governors understand their strategic responsibilities in relation to filtering and monitoring and receive appropriate information to enable them to provide effective oversight;
- review the Department for Education's **Filtering and Monitoring Standards for Schools and Colleges**, working with school leaders, IT providers and technical staff to ensure the standards are met and remain effective;
- seek assurance that appropriate cyber security measures are in place to support the safe operation of filtering, monitoring and safeguarding systems.

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The governing board will ensure that:

- the Designated Safeguarding Lead has the appropriate status, authority, time, funding, supervision, training, resources and support necessary to carry out the role effectively;
- online safety is recognised as a running and interrelated theme throughout the school's whole-school safeguarding approach and is reflected across relevant policies and procedures;
- the Designated Safeguarding Lead has lead responsibility for safeguarding, including online safety, and maintains an appropriate understanding of the school's filtering and monitoring systems and associated safeguarding risks;
- appropriate procedures are in place for managing safeguarding concerns, allegations and low-level concerns relating to staff, volunteers, contractors and supply staff. These procedures are set out in Appendix 3 of this policy;
- safeguarding arrangements recognise that children with special educational needs and/or disabilities (SEND), certain medical conditions or additional vulnerabilities may face additional barriers to recognising, disclosing or reporting abuse or neglect;
- appropriate arrangements exist to identify and support children who may benefit from Family Help, children with social workers and children who have experienced abuse, neglect or exploitation;
- safeguarding arrangements are reviewed regularly to ensure they remain effective and reflect local and national safeguarding developments.

Where another organisation or individual provides services or activities on behalf of the school, or uses the school premises (whether or not the children involved are pupils on roll at the school), the governing board will ensure that:

- appropriate safeguarding and child protection policies and procedures are in place and comply with current statutory guidance;
- suitable safeguarding assurances are obtained before any agreement is entered into and monitored thereafter;
- arrangements are in place for effective communication and liaison between the provider and the school regarding safeguarding concerns where appropriate;
- safeguarding responsibilities are clearly set out within contracts or lettings agreements;
- permission to use the school's premises may be withdrawn where safeguarding requirements are not met.

The Chair of Governors will normally act as the case manager where an allegation or concern is raised about the headteacher, in accordance with the procedures set out in Appendix 3 and relevant statutory guidance.

All governors will read *Keeping Children Safe in Education (2026)* and receive safeguarding training appropriate to their strategic governance role.

Section 15 of this policy explains how governors are supported to fulfil their safeguarding responsibilities.

5.4 The Headteacher

The headteacher has overall responsibility for the implementation of this Child Protection and Safeguarding Policy and for promoting a strong safeguarding culture throughout the school. The headteacher is responsible for:

- ensuring that all staff (including temporary staff, agency staff, contractors and volunteers):
 - are informed of the school's safeguarding systems, including this policy, the Staff Code of Conduct, the Behaviour Policy, the Online Safety Policy, the identity of the Designated Safeguarding Lead (DSL) and deputy DSLs, and safeguarding procedures as part of their induction;
 - understand and follow the procedures contained within this policy, particularly those relating to the identification, recording and referral of safeguarding concerns;
 - receive safeguarding and child protection training (including online safety) appropriate to their role and regular safeguarding updates throughout the year;
- communicating this policy to parents and carers when their child joins the school and ensuring that the policy is published on the school's website;

Love, Listen and Learn

- ensuring that the Designated Safeguarding Lead and deputy DSLs have sufficient time, funding, supervision, training, resources and authority to fulfil their safeguarding responsibilities effectively;
- ensuring there is always appropriate safeguarding cover available whenever the school is open and when pupils are participating in school-led activities outside normal school hours;
- ensuring that safeguarding and child protection training is delivered at induction, updated regularly and reflects current statutory guidance, local safeguarding arrangements and emerging safeguarding risks;
- promoting a whole-school safeguarding culture in which pupils feel safe, concerns are taken seriously and safeguarding is everyone's responsibility;
- ensuring that appropriate filtering and monitoring systems are in place and that staff understand their responsibilities in relation to online safety and digital safeguarding;
- overseeing the safe and appropriate use of technology, mobile devices, cameras and other digital equipment within the school;
- ensuring that safer recruitment procedures are followed in accordance with statutory guidance;
- acting as the case manager where an allegation or safeguarding concern is made about a member of staff, volunteer, contractor or supply staff, where appropriate (see Appendix 3);
- making decisions regarding all low-level concerns relating to adults working in the school, while working closely with the DSL where appropriate;
- ensuring appropriate staffing ratios are maintained where required by legislation and statutory guidance;
- ensuring that every child in the Early Years Foundation Stage is assigned a key person in accordance with the EYFS statutory framework;
- ensuring that the school works effectively with safeguarding partners, Children's Social Care, Family Help services, the Police and other relevant agencies to safeguard children; and
- ensuring that safeguarding remains a priority within school improvement planning, quality assurance and self-evaluation processes.

5.5 Virtual School Heads

Virtual School Heads have a non-statutory responsibility to promote the educational achievement of children with a social worker through strategic leadership and the provision of advice, information and guidance to schools and other relevant agencies.

The Virtual School Head should work strategically with schools, safeguarding partners and local authorities to improve the educational attendance, attainment, progress and outcomes of children with a social worker.

The Virtual School Head should identify, engage with and provide strategic advice to key professionals, including:

- Designated Safeguarding Leads (DSLs);
- Special Educational Needs Co-ordinators (SENCOs);
- social workers;
- mental health leads;
- school leaders; and
- other professionals working to support children with a social worker.

The school will work collaboratively with the Virtual School Head where appropriate to promote the educational achievement, attendance, engagement and wellbeing of children with a social worker, recognising that the Virtual School Head does not have direct responsibility for individual children and that responsibility for safeguarding remains with the school and relevant statutory agencies.

6. Confidentiality

The school recognises that all matters relating to safeguarding and child protection are confidential. The Headteacher, Designated Safeguarding Lead (DSL) or deputy DSL will disclose information about a child only on a **need-to-know** basis and only where it is necessary to safeguard and promote the welfare of the child. All staff must

Love, Listen and Learn

understand that they have a professional responsibility to share information with relevant agencies and professionals where this is necessary to safeguard children.

Staff must never promise a child that they will keep a disclosure or safeguarding concern secret. Children should instead be reassured that information will only be shared with those who need to know in order to help keep them safe.

The school recognises that:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must never stand in the way of protecting children or promoting their welfare;
- the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) do not prevent or limit the sharing of information where it is necessary to safeguard children;
- where staff need to share special category personal data, the Data Protection Act 2018 provides safeguarding conditions which may permit information sharing without consent where obtaining consent is not possible, cannot reasonably be expected or would place a child or another person at greater risk of harm;
- information sharing decisions should be proportionate, necessary, lawful and recorded where appropriate.

Where a child reports sexual violence or sexual harassment and asks that information is not shared, the Designated Safeguarding Lead will carefully balance the child's wishes with the school's duty to safeguard that child and others. In doing so, the DSL will consider that:

- parents or carers should normally be informed unless doing so would place the child at greater risk of harm;
- if a child is suffering, or is likely to suffer, significant harm, an immediate referral should be made to Children's Social Care;
- rape, assault by penetration and sexual assault are criminal offences and reports of these offences should normally be referred to the Police, regardless of the age of the alleged perpetrator, with appropriate consideration given to safeguarding arrangements where the alleged perpetrator is below the age of criminal responsibility; and
- the wishes, feelings, safety and wellbeing of the child must remain central to all decision-making.

When responding to reports of sexual violence or sexual harassment, all staff will:

- understand the importance of protecting the anonymity and privacy of all children involved wherever possible;
- carefully consider who needs to know about the report in order to safeguard children effectively;
- recognise the impact that social media and digital technology may have in spreading rumours, identifying children or causing further harm; and
- ensure that any information shared is proportionate, appropriate and consistent with safeguarding responsibilities.

The school follows the Government's **Information Sharing: Advice for Practitioners Providing Safeguarding Services** and the **seven golden rules for information sharing** when making decisions about sharing information. Where staff are uncertain about whether information should be shared, they must seek advice from the Designated Safeguarding Lead or a deputy DSL without unnecessary delay. Further information relating to confidentiality is contained within Section 14 (Record Keeping) and Appendix 3 (Managing Allegations and Low-Level Concerns About Adults Working with Children).

7. Recognising Abuse and Taking Action

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All staff are expected to identify, recognise and respond appropriately to all forms of abuse, neglect, exploitation and safeguarding concerns. Staff should be alert to the potential need for **Family Help** and early intervention, recognising that any child may benefit from additional support at any stage of their life.

Staff should exercise professional curiosity and recognise that safeguarding concerns often overlap. Children may experience multiple and interacting vulnerabilities which increase their risk of harm. All staff should be particularly alert to children who:

- are disabled;
- have special educational needs and/or disabilities (SEND), whether or not they have an Education, Health and Care (EHC) Plan;
- are young carers;
- are bereaved;
- are showing signs of being drawn into anti-social behaviour, criminal behaviour, gangs, county lines, organised crime groups or serious violence, including knife crime;
- are frequently absent, missing from education, missing from home or missing from care;
- are at risk of modern slavery, trafficking, child sexual exploitation (CSE), child criminal exploitation (CCE) or other forms of exploitation;
- are vulnerable to radicalisation or extremism;
- are accessing harmful, violent, extremist, exploitative or age-inappropriate online content, or developing inappropriate or exploitative online relationships;
- are affected by emerging online risks, including online grooming, sextortion, the misuse of artificial intelligence or other evolving technologies;
- are living in family circumstances presenting challenges, including domestic abuse, parental conflict that is frequent, intense and unresolved, parental substance misuse, parental mental ill health or parental offending;
- are misusing drugs, alcohol or other substances;
- are experiencing mental ill health or emotional wellbeing difficulties;
- have returned home from care or are living in kinship care arrangements;
- are at risk of so-called honour-based abuse, including female genital mutilation (FGM) or forced marriage;
- are privately fostered;
- have a parent or carer in custody or are affected by parental offending;
- have a social worker or are receiving Family Help support;
- are missing education, persistently absent, severely absent or not receiving suitable full-time education; or
- have experienced repeated suspensions, suspensions or permanent exclusion, placing them at greater risk of harm or exploitation.

Staff should recognise that these vulnerabilities do not exist in isolation and that children experiencing multiple vulnerabilities may require coordinated multi-agency support. Staff, volunteers and governors must follow the safeguarding procedures set out within this policy whenever they have concerns about a child's welfare or safety. For the purposes of this and subsequent sections, any reference to the Designated Safeguarding Lead (DSL) should be read as meaning **the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead**.

7.1 If a Child is Suffering or Likely to Suffer Harm, or is in Immediate Danger

If you believe that a child is suffering, is likely to suffer, or is at risk of suffering significant harm, or is in immediate danger, you must act immediately.

A referral must be made without delay to Children's Social Care and/or the Police. Anyone can make a referral if they believe a child is at risk.

If a member of staff makes a referral directly, they must inform the Designated Safeguarding Lead (DSL) as soon as possible, unless doing so would place the child or another person at greater risk of harm.

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Staff should not assume that someone else will take action and should never delay making a referral because they are uncertain. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the child's welfare must always be the paramount consideration.

Where appropriate, and where the threshold for statutory intervention is not met, the DSL may consider whether a referral for Family Help or other early support services is required. However, the need to consider early help must never delay an immediate child protection referral.

[Further information about reporting concerns can be found through the local authority's Children's Social Care service and the Government guidance on reporting child abuse.](#)

7.2 If a Child Makes a Disclosure to You

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

- listen carefully, take the child seriously and believe what they are telling you;
- allow the child to speak freely and do not interrupt or ask leading questions;
- remain calm and do not show shock, disbelief or distress;
- reassure the child that they have done the right thing by telling you and that they will be supported;
- never promise confidentiality. Explain, in a way that is appropriate to the child's age and understanding, that you will need to share the information with people who can help keep them safe;
- avoid making promises about what will happen next or the outcome of any investigation;
- record the conversation as soon as possible, using the child's own words wherever possible, clearly distinguishing between fact, observation and professional opinion;
- sign, date and securely submit the record to the Designated Safeguarding Lead (DSL) without delay; and
- where appropriate, make a referral directly to Children's Social Care and/or the Police in accordance with Section 7.1 if you believe a child is suffering, or is likely to suffer, significant harm. The DSL should be informed as soon as possible unless doing so would place the child or another person at greater risk.

Information relating to the disclosure must only be shared with those who need to know in order to safeguard the child or where required by law.

Staff should bear in mind that some children may:

- not feel ready, or know how, to tell someone that they are being abused, neglected or exploited;
- not recognise that what they are experiencing is abuse, neglect or exploitation;
- be unable to articulate their concerns because of their age, communication needs or disability;
- feel embarrassed, ashamed, frightened, intimidated or threatened;
- fear that they will not be believed or that they will get into trouble;
- worry about the consequences for themselves, their family or others; or
- face additional barriers because of special educational needs and/or disabilities (SEND), mental health needs, language barriers, culture or other vulnerabilities.

None of these factors should prevent staff from maintaining professional curiosity, speaking to the Designated Safeguarding Lead where they have concerns, or taking appropriate safeguarding action. A disclosure should never be regarded as the only indicator that a child may be at risk of harm.

7.3 If You Discover that FGM Has Taken Place or a Pupil is at Risk of FGM

Keeping Children Safe in Education (2026) explains that **female genital mutilation (FGM)** comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons."

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FGM is illegal in the UK, is a form of child abuse and violence against women and girls, and has serious lifelong physical and emotional consequences. It is sometimes referred to as **female genital cutting (FGC)**, **circumcision** or **initiation**, although these terms do not accurately reflect the nature of the abuse.

Possible indicators that a child has already been subjected to FGM, and factors that may indicate that a child is at risk, are set out in **Appendix 4** of this policy.

Mandatory reporting duty

Any teacher who either:

- is informed by a girl under the age of 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that FGM has been carried out on a girl under the age of 18, and has no reason to believe that the procedure was necessary for the girl's physical or mental health or was carried out for purposes connected with labour or birth,

must make a report to the Police immediately.

This is a personal statutory duty placed upon teachers under the **Female Genital Mutilation Act 2003 (as amended)**. Failure to comply with this duty may result in disciplinary action.

Unless specifically advised otherwise by the Police or Children's Social Care, the teacher should also inform the Designated Safeguarding Lead (DSL) as soon as possible so that appropriate safeguarding action can be taken.

Other members of staff

Any member of staff who becomes aware that FGM appears to have been carried out on a child, or who has concerns that a child may be at risk of FGM, must report their concerns immediately to the Designated Safeguarding Lead and follow the school's safeguarding procedures. The mandatory reporting duty described above applies **only to teachers** and **only where FGM is known to have been carried out**. It does **not** apply where FGM is suspected or where a child is considered to be at risk.

Staff must **never** attempt to examine a child to determine whether FGM has taken place.

Where FGM is suspected, or where there are concerns that a child may be at risk, the Designated Safeguarding Lead will consider the appropriate safeguarding response, including referral to Children's Social Care and, where appropriate, the Police, in accordance with local safeguarding procedures.

7.4 If You Have Concerns About a Child (but Do Not Believe They Are Suffering or Likely to Suffer Significant Harm, or Are in Immediate Danger)

Figure 1 (before Section 7.7) illustrates the safeguarding procedures to follow if you have concerns about a child's welfare. Where possible, discuss your concerns with the Designated Safeguarding Lead (DSL) as soon as possible to agree the most appropriate course of action. Staff should not assume that another person will take action. If you have concerns about a child, you must act promptly and maintain professional curiosity, recognising that early identification and intervention are key to safeguarding children. Where appropriate, the DSL will consider whether the child may benefit from **Family Help** or other early support services, while recognising that early intervention must never delay action where there is a risk of significant harm. If, in exceptional circumstances, the DSL (or deputy DSL) is not immediately available, this must **not** delay appropriate safeguarding action.

In these circumstances, staff should:

- speak to a member of the senior leadership team where available;
- seek advice from Children's Social Care or other appropriate safeguarding professionals if required;
- make a referral directly to Children's Social Care if this is considered necessary; and
- share details of any action taken with the DSL as soon as reasonably practicable.

Staff may also seek safeguarding advice from the **NSPCC Helpline** where appropriate.

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Anyone can make a referral to Children's Social Care if they believe this is necessary to safeguard a child. If a referral is made directly by a member of staff, the Designated Safeguarding Lead should be informed as soon as possible unless doing so would place the child or another person at increased risk of harm.

Family Help Assessment

Where **Family Help** (sometimes referred to locally as Early Help) is appropriate, the Designated Safeguarding Lead (DSL) will normally lead on liaising with other agencies and professionals and, where appropriate, support the completion of an inter-agency assessment. Staff may be required to contribute to Family Help assessments, attend multi-agency meetings, share relevant information and, where appropriate, act as the Lead Practitioner in accordance with local arrangements. The school will work collaboratively with safeguarding partners and other agencies to ensure that children and families receive timely and appropriate support. The level of intervention will be determined in accordance with local multi-agency thresholds and safeguarding arrangements. The DSL will keep all Family Help cases under regular review to ensure that support remains appropriate and effective. Where a child's circumstances do not improve, deteriorate, or where there is evidence that the child is suffering, or is likely to suffer, significant harm, the DSL will ensure that a referral is made to Children's Social Care without delay. The school will maintain clear safeguarding records, monitor the impact of interventions and regularly review outcomes to ensure that children receive the support they need at the earliest opportunity.

Referral

Where it is appropriate to refer a case to Children's Social Care, the Police or another appropriate safeguarding agency, the Designated Safeguarding Lead (DSL) will normally make the referral.

However, any member of staff may make a referral directly to Children's Social Care if they believe this is necessary to safeguard a child (see Section 7.1). If you make a referral directly, you must inform the DSL as soon as possible, unless doing so would place the child or another person at increased risk of harm.

Children's Social Care should acknowledge the referral and make a decision about the next course of action within **one working day**. The person who made the referral should be informed of the outcome.

If the outcome of the referral is not communicated within the expected timescale, the DSL or the person who made the referral must follow up with Children's Social Care to ensure that appropriate action has been taken and that the outcome is appropriately recorded.

If the child's circumstances do not appear to be improving following the referral, or if there is disagreement about the appropriate course of action, the DSL or the person who made the referral must follow local multi-agency escalation (professional challenge) procedures to ensure that concerns are addressed and that the child receives the protection and support they need.

The school will maintain accurate, confidential safeguarding records of all referrals, decisions, actions taken and outcomes.

7.5 If You Have Concerns About Extremism

Radicalisation is a safeguarding issue and should be treated in the same way as other safeguarding concerns. Children can be susceptible to extremist ideologies and radicalisation both online and offline.

If you have concerns that a child may be vulnerable to radicalisation or involvement in extremism, but the child is not suffering, or likely to suffer, significant harm or in immediate danger, you should, where possible, speak to the Designated Safeguarding Lead (DSL) to agree an appropriate course of action.

Love, Listen and Learn

If, in exceptional circumstances, the DSL (or deputy DSL) is not available, this must not delay appropriate safeguarding action. Staff should speak to a member of the senior leadership team where possible and seek advice from Children's Social Care or other appropriate safeguarding professionals if required. A referral may be made directly to Children's Social Care where appropriate (see **Referral** above). The DSL or deputy DSL should be informed as soon as reasonably practicable after any referral has been made.

Where concerns relate to radicalisation or extremism, the DSL will assess the level of risk and determine the most appropriate safeguarding response. This may include making a referral to the Police, **Channel** (the voluntary, multi-agency programme which provides support for individuals who are susceptible to being drawn into terrorism), Children's Social Care or another appropriate agency, in accordance with local safeguarding arrangements.

Staff should be aware that radicalisation can take place through personal contact, social media, online platforms, gaming, messaging services, live-streaming, or other digital technologies. Concerns should be reported promptly in accordance with this policy.

The Department for Education provides a dedicated **Prevent** helpline (020 7340 7264) and email service (counter.extremism@education.gov.uk) for school staff and governors to seek advice about concerns relating to extremism. These services are **not** for use in emergency situations.

In an emergency, staff should call **999** if there is an immediate risk to life or a terrorist incident. Staff may also contact the confidential Anti-Terrorist Hotline on **0800 789 321** if they become aware of information that may relate to terrorist activity, including where they:

- believe someone is in immediate danger;
- believe someone may be planning to travel to join an extremist or terrorist group; or
- see or hear information that may relate to terrorism or extremist activity.

7.6 If You Have a Mental Health Concern

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other adverse childhood experiences.

Staff should remain alert to behaviours, changes in presentation or emotional wellbeing that may indicate a child is experiencing mental health difficulties or is at risk of developing them. These signs should be considered in the context of the child's wider circumstances and should not be viewed in isolation.

Where staff have a mental health concern about a child that is also a safeguarding concern, they must take immediate action by following the procedures set out in Section 7.4 of this policy.

Where staff have a mental health concern that is not, in itself, a safeguarding concern, they should discuss the matter with the Designated Safeguarding Lead (DSL), who will consider the most appropriate course of action. This may include liaising with parents or carers (where appropriate), pastoral staff, health professionals or other support services.

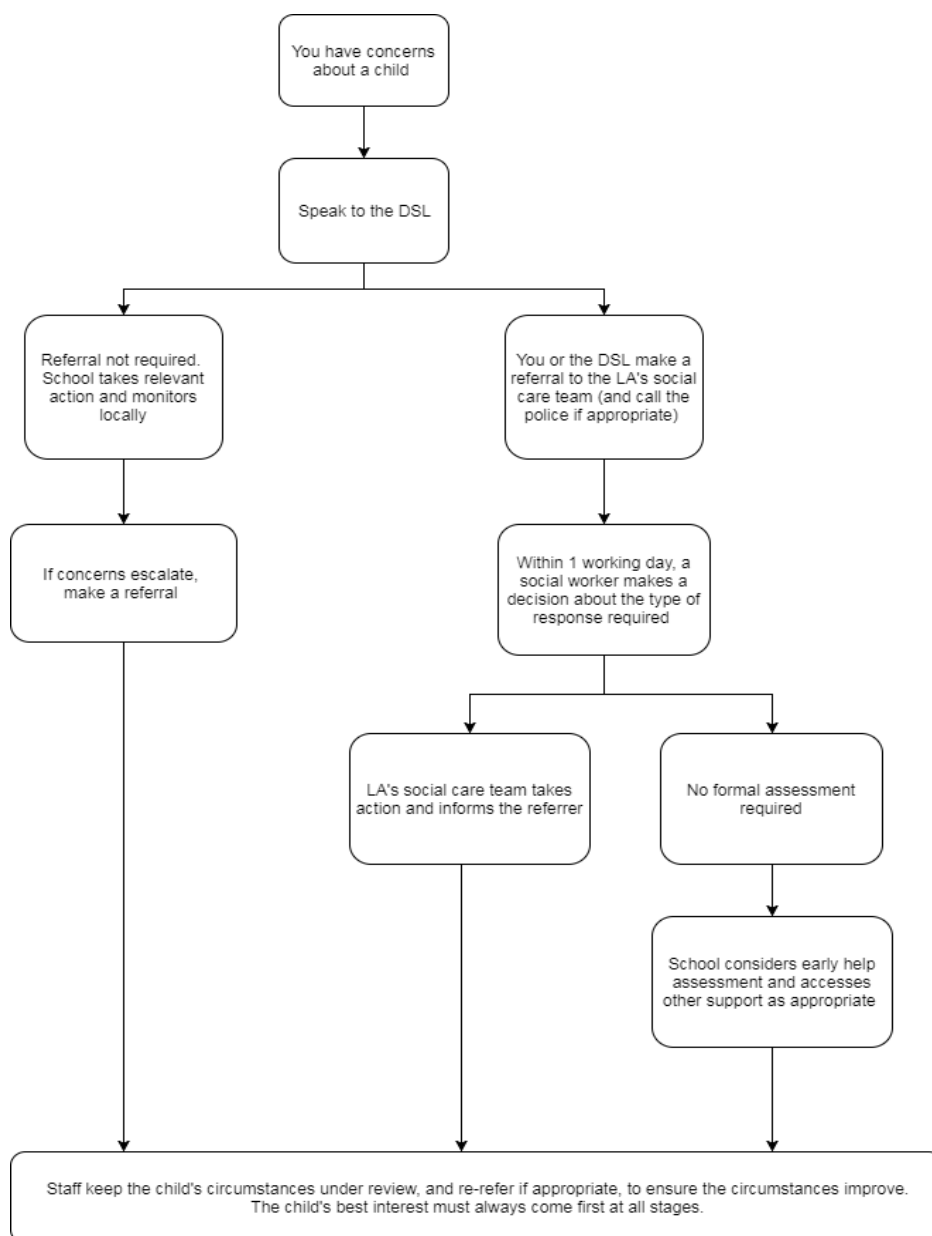
The school recognises that only appropriately trained professionals should attempt to diagnose mental health conditions. Staff are not expected to make clinical judgements but should identify concerns, record them appropriately and share them in accordance with this policy.

Further guidance is available in the Department for Education's guidance *Mental Health and Behaviour in Schools* and other relevant statutory and non-statutory guidance.

Figure 1: Procedure if You Have Concerns About a Child's Welfare

(This procedure applies where you have concerns about a child's welfare but do not believe the child is suffering, or is likely to suffer, significant harm, or is in immediate danger.)

Important: If the Designated Safeguarding Lead (DSL) or deputy DSL is unavailable, this **must not delay** appropriate safeguarding action. Follow the guidance in **Section 7.4** of this policy. Staff should act promptly, maintain professional curiosity and, where necessary, make a referral directly to Children's Social Care in accordance with this policy.



7.7 Concerns About a Staff Member, Supply Teacher, Volunteer or Contractor

Love, Listen and Learn

If you have concerns about the conduct of a member of staff (including a supply teacher, volunteer, contractor or any other adult working with children), or receive an allegation that they may have behaved in a way that poses a risk of harm to a child or children, you must report the concern immediately.

Concerns or allegations should be reported to the Headteacher as soon as possible. If the concern or allegation relates to the Headteacher, it must be reported without delay to the Chair of Governors.

The Headteacher or Chair of Governors will manage the concern or allegation in accordance with the procedures set out in **Appendix 3** of this policy and the statutory guidance in *Keeping Children Safe in Education 2026*. This will include seeking advice from the Local Authority Designated Officer (LADO) where appropriate.

Where a person believes there is a conflict of interest in reporting a concern or allegation to the Headteacher, or where the Headteacher is the subject of the concern and the Chair of Governors is unavailable, the concern should be reported directly to the **Local Authority Designated Officer (LADO)**.

Where an allegation relates to an individual or organisation using the school's premises to provide activities or services for children (whether or not under the direct management of the school), the school will follow its safeguarding procedures and consult the LADO as appropriate, in the same way as for any other safeguarding allegation.

Where required, the school will notify Ofsted, the relevant safeguarding partners and any other appropriate regulatory body of allegations and actions taken, within the required statutory timescales.

The school recognises that concerns about adults working with children may also meet the threshold for reporting **low-level concerns**. Such concerns will be managed in accordance with the school's Low-Level Concerns Policy and the procedures set out in Appendix 3.

7.8 Allegations of Abuse Made Against Other Pupils

The school recognises that children are capable of abusing other children (child-on-child abuse). All child-on-child abuse is unacceptable and will be taken seriously.

Abuse between children will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys", as this can create an unsafe culture in which harmful behaviour is normalised.

The school recognises that child-on-child abuse is most likely to include, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse;
- initiation or hazing-type violence;
- abuse within intimate personal relationships between children;
- sexual violence;
- sexual harassment;
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- upskirting (which is a criminal offence);
- abuse involving online technology, including coercion, threats, exploitation and harmful online behaviour.

The school also recognises the gendered nature of many forms of child-on-child abuse. However, all allegations will be taken seriously regardless of the sex, gender identity or characteristics of those involved.

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Most incidents involving pupils will be managed through the school's Behaviour Policy. However, this Child Protection and Safeguarding Policy will apply whenever behaviour raises safeguarding concerns, including where the alleged behaviour:

- is serious or potentially constitutes a criminal offence;
- places another child at risk of harm;
- involves physical violence;
- involves coercion, exploitation or abuse;
- involves the use of drugs or alcohol to facilitate abuse;
- involves sexual violence, sexual harassment or sexually harmful behaviour; or
- involves the creation, possession or sharing of nude or semi-nude images or videos.

Further guidance is provided in **Appendix 4**.

Procedures for Managing Allegations of Child-on-Child Abuse

Where a child makes an allegation of abuse against another child:

- staff must listen carefully, reassure the child, record the concern accurately and report it immediately to the Designated Safeguarding Lead (DSL);
- staff must not investigate the allegation or ask leading questions;
- the DSL will undertake an initial risk assessment and consider the needs and safety of all children involved;
- where appropriate, the DSL will consult Children's Social Care, the Police and other relevant agencies;
- appropriate support will be provided to the victim, the alleged perpetrator and any other children affected;
- individual risk assessments and support plans will be implemented, reviewed regularly and amended where necessary. These will include consideration of transport arrangements, shared spaces, timetabling, online contact and any other circumstances where children may come into contact.

Where allegations involve sexual violence or sexual harassment, the school will follow the guidance set out in **Keeping Children Safe in Education 2026** and will work closely with Children's Social Care and the Police where appropriate.

Where there are delays in criminal proceedings, the school will continue to safeguard and support all children involved while working closely with the Police and other agencies. Any disciplinary action will be considered on a case-by-case basis in accordance with statutory guidance.

The DSL will consider referrals to Child and Adolescent Mental Health Services (CAMHS) or other appropriate health and support services where required.

Creating a Supportive Environment and Reducing the Risk of Child-on-Child Abuse

The school is committed to preventing child-on-child abuse by promoting a culture of respect, inclusion and safeguarding.

To achieve this, the school will:

- challenge inappropriate, abusive, misogynistic, discriminatory or sexualised language and behaviour;
- educate pupils about healthy relationships, respect, consent, online safety and appropriate behaviour through the curriculum;
- ensure pupils know how to report concerns confidently and understand that reports will always be taken seriously;
- provide appropriate support for victims and reassure them that they will be listened to, believed and supported;

Love, Listen and Learn

- identify environmental or contextual factors contributing to abuse and address these through policies, supervision, curriculum and risk assessments;
- recognise that social media, messaging services, gaming platforms and other online technologies may contribute to abuse or continue the impact of incidents outside school;
- consider intra-familial harm and the needs of siblings where appropriate; and
- work with safeguarding partners and other agencies where wider contextual safeguarding concerns are identified.

Staff Awareness

All staff will receive appropriate safeguarding training to ensure they understand:

- how to recognise and respond to child-on-child abuse;
- that abuse may go unreported and staff should always maintain an attitude of **"it could happen here"**;
- that children may disclose abuse in different ways, including through changes in behaviour, indirect comments, friends, observations or online activity;
- that some children face additional barriers to reporting because of SEND, disability, communication needs, age, culture, language, gender, ethnicity or other vulnerabilities;
- that children who abuse others may themselves be victims of abuse or exploitation and require safeguarding support;
- their responsibility to respond immediately to concerns and report them to the DSL; and
- the significant role that online platforms and social media may play before, during and after incidents of child-on-child abuse.

7.9 Sharing of Nudes and Semi-Nudes ('Sexting')

Staff Responsibilities When Responding to an Incident

If you become aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images or videos, including computer-generated pseudo-images that appear to be photographs or videos (sometimes referred to as *'sexting'* or *'youth-produced sexual imagery'*), you must report the incident immediately to the Designated Safeguarding Lead (DSL).

Staff **must not**:

- view, copy, print, share, store or save the imagery themselves, or ask a child to share or download it (if imagery has been viewed inadvertently, this must be reported immediately to the DSL);
- delete the imagery or ask a child to delete it;
- ask the child or children involved to disclose detailed information about the imagery (this is the responsibility of the DSL and, where appropriate, the Police or Children's Social Care);
- share information about the incident with other staff, children or parents/carers unless there is a safeguarding need to do so; or
- make comments or behave in a way that blames, shames or humiliates any child involved.

Staff should explain to the child that the information cannot be kept confidential because it must be shared with people who can help keep them safe. The child should be reassured that they will be listened to, supported and kept informed throughout the process.

Initial Review by the DSL

Following a report, the DSL will undertake an immediate initial review with appropriate members of staff.

The purpose of the review is to determine:

- whether any child is at immediate risk of harm;
- whether a referral should be made to the Police and/or Children's Social Care;
- whether it is necessary to view the imagery (in most cases, this will **not** be necessary);
- what further information is required;
- whether the imagery has been shared more widely and on which platforms;
- whether immediate steps should be taken to secure deletion of the imagery where appropriate;
- whether there are contextual safeguarding concerns;

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- whether another school, college or agency should be contacted; and
- whether parents or carers should be informed (unless doing so would place a child at greater risk of harm).

Referral to the Police and/or Children's Social Care

The DSL will normally make an immediate referral where:

- an adult is involved;
- there are concerns that a child has been coerced, exploited, blackmailed or groomed;
- there are concerns about a child's capacity to consent, including because of SEND or other vulnerabilities;
- the imagery depicts sexual acts that are unusual for the child's developmental stage or involves violence;
- any child shown in sexual imagery is under the age of 13; or
- there is reason to believe that any child is at immediate risk of significant harm.

Where none of these circumstances apply, the DSL, in consultation with the Headteacher where appropriate, may decide to manage the incident internally. The rationale for this decision will be clearly recorded.

Further Review

Where a referral is not made immediately, the DSL will carry out a further review, gather relevant information and undertake a risk assessment.

Where appropriate, the DSL may speak with the children involved. If, at any stage, there is evidence that a child has been harmed or is at risk of harm, an immediate referral will be made to Children's Social Care and/or the Police.

Informing Parents and Carers

Parents or carers will normally be informed and involved at an early stage unless doing so would place a child at increased risk of harm or compromise a safeguarding investigation.

Contacting the Police

Where Police involvement is required, the school will contact the appropriate Police service in accordance with local safeguarding arrangements and any locally agreed protocols.

Recording Incidents

All incidents involving the sharing of nude or semi-nude images, together with risk assessments, decisions, referrals, actions taken and outcomes, will be recorded in accordance with the school's safeguarding recording procedures.

Curriculum Coverage

Pupils are taught about the risks associated with sharing nude and semi-nude images through the Relationships Education, Relationships and Sex Education (where applicable), Computing and Online Safety curricula.

Teaching includes:

- what the sharing of nude and semi-nude images is;
- how such incidents commonly occur;
- consent, healthy relationships and respect;
- the legal implications;
- online sexual harassment and exploitation;
- the emotional, reputational and safeguarding consequences;
- how to respond if asked to create, send or share images; and
- how to seek help if images are received or shared.

Teaching follows recognised best practice by:

- placing safeguarding at the centre of learning;
- adopting a child-centred approach;
- promoting respectful discussion and understanding;
- empowering children to seek help;
- avoiding fear-based approaches; and
- challenging victim-blaming attitudes and harmful stereotypes.

7.10 Reporting Systems for Our Pupils

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Where there is a safeguarding concern, the school will always take the child's wishes, views and feelings into account when determining what action to take and what services to provide. These will be considered alongside the school's duty to safeguard and promote the welfare of children.

The school recognises the importance of ensuring that all pupils feel safe, listened to and able to report concerns, worries or allegations of abuse, knowing that they will be taken seriously and responded to appropriately.

To achieve this, we will:

- encourage pupils to talk to any trusted adult in school whenever they have a concern or worry;
- provide age-appropriate opportunities for pupils to report concerns, including speaking directly to staff and using classroom 'worry boxes', which are checked daily;
- ensure our reporting systems are well publicised, easy to understand and readily accessible to all pupils;
- make reasonable adjustments, where necessary, so that children with SEND, communication needs or other vulnerabilities can report concerns in ways that are appropriate for them;
- create a culture in which children know they will be listened to, believed and supported when they raise concerns;
- make it clear that concerns will always be taken seriously and that pupils can safely express their views and provide feedback;
- ensure pupils know how to report concerns about behaviour both in school and online; and
- regularly reinforce safeguarding messages through the curriculum, assemblies, pastoral support and wider school life so that pupils know where to seek help.

The school recognises that some children may find it difficult to report abuse or neglect directly. Staff will therefore remain vigilant to changes in behaviour, presentation or emotional wellbeing and will maintain professional curiosity where they have concerns about a child's welfare.

8. Online Safety and the Use of Mobile Technology

The school recognises the importance of safeguarding children from potentially harmful and inappropriate online content, contact, conduct and commercial risks. Technology is a significant component of many safeguarding and wellbeing issues, and online safety is an integral part of the school's whole-school safeguarding approach.

To address this, the school aims to:

- maintain effective filtering and monitoring systems that safeguard pupils, staff, volunteers and governors while supporting teaching and learning;
- protect and educate the whole school community in the safe, responsible and appropriate use of technology, including mobile and smart technology (referred to throughout this policy as "mobile phones");
- promote safe, respectful and responsible online behaviour both within and beyond the school environment;
- establish clear procedures for identifying, responding to, recording and escalating online safety concerns;
- ensure filtering and monitoring arrangements are regularly reviewed and remain appropriate to the school's safeguarding needs; and
- recognise and respond to emerging technologies, including artificial intelligence (AI) and generative AI, ensuring pupils are taught to use these technologies safely, responsibly and critically.

The Four Key Categories of Online Risk

The school's online safety arrangements are based upon addressing the four categories of online risk identified within *Keeping Children Safe in Education 2026*:

Content – exposure to illegal, inappropriate or harmful material, including pornography, violent content, racism, misogyny, self-harm, suicide, eating disorders, antisemitism, radicalisation, extremism, misinformation, disinformation, conspiracy theories and AI-generated harmful content.

Contact – harmful online interaction with others, including grooming, child sexual abuse and exploitation, criminal exploitation, coercion, commercial exploitation, fraud and adults posing as children or young people.

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Conduct – online behaviour that increases the likelihood of harm, including cyberbullying, online abuse, sharing nude or semi-nude images, harassment, exploitation, inappropriate use of AI tools and other harmful online behaviour.

Commerce – risks associated with online gambling, phishing, scams, financial exploitation, inappropriate advertising, fraudulent activity and other commercial risks.

To Meet These Aims the School Will:

- educate pupils about online safety through a broad, age-appropriate curriculum, including:
 - safe use of the internet, social media and digital technologies;
 - protecting personal information and digital identity;
 - recognising online abuse, exploitation, misinformation and manipulation;
 - healthy online relationships and respectful online behaviour;
 - responsible use of artificial intelligence (AI) and emerging technologies;
 - how and where to report online concerns, including where a child is a witness rather than a victim;
- ensure all staff receive online safety and safeguarding training as part of their induction and regular safeguarding updates, including:
 - cyberbullying;
 - online sexual abuse and exploitation;
 - online radicalisation;
 - filtering and monitoring responsibilities;
 - cyber security awareness; and
 - emerging technologies, including AI where relevant;
- educate parents and carers about online safety through the school website, newsletters, workshops, information evenings and direct communications, enabling them to support their children safely online;
- ensure staff understand and comply with expectations regarding the use of mobile phones, cameras and personal devices, including:
 - personal mobile phones must only be used during authorised non-contact time unless there is an emergency;
 - personal devices must never be used to photograph or record pupils;
 - school-approved devices and systems will be used for educational and safeguarding purposes;
- require staff, pupils, governors, volunteers and visitors, where appropriate, to comply with the school's Acceptable Use Agreements for technology;
- ensure pupils understand the consequences of breaching acceptable use expectations and apply appropriate sanctions in accordance with the Behaviour Policy;
- ensure staff understand their powers in relation to searching, screening and confiscation in accordance with current Department for Education guidance;
- maintain appropriate filtering and monitoring systems which are reviewed regularly, proportionate to the age of pupils and responsive to emerging safeguarding risks;
- ensure governors receive appropriate information to enable them to provide effective strategic oversight of filtering and monitoring arrangements;
- undertake regular reviews and risk assessments of online safety arrangements to ensure they remain effective and reflect the changing risks faced by the school community;
- provide regular safeguarding updates, including online safety, to all staff throughout the academic year; and
- review this Child Protection and Safeguarding Policy, together with the Online Safety Policy and related procedures, at least annually and whenever statutory guidance changes.

This section provides an overview of the school's approach to online safety and mobile technology. Full details are contained within the school's separate **Online Safety Policy**, which is available on the school website.

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8.1 Artificial Intelligence (AI)

Generative Artificial Intelligence (AI) tools are now widely available and increasingly used within education and everyday life. Staff, pupils and parents/carers may be familiar with AI tools such as ChatGPT, Google Gemini and other generative AI applications.

St. Mary's Primary School recognises that AI has the potential to enhance teaching, learning, assessment, administration and safeguarding. However, the school also recognises that AI presents safeguarding, privacy and online safety risks if used inappropriately.

Potential risks associated with AI include, but are not limited to:

- the creation or sharing of harmful, inappropriate or illegal content;
- cyberbullying, harassment and abuse;
- grooming, exploitation or manipulation of children;
- the creation and sharing of realistic AI-generated images, audio or video ('deepfakes');
- exposure to misinformation, disinformation or biased content;
- breaches of privacy, confidentiality or data protection; and
- over-reliance on AI-generated content without appropriate human oversight.

The school will treat any misuse of AI which places a child at risk of harm, facilitates bullying or harassment, or breaches the school's safeguarding, behaviour or acceptable use policies as a safeguarding concern and respond in accordance with this policy.

Staff must exercise professional judgement when using AI tools and ensure that they do not input confidential, personal or sensitive information into public AI platforms unless this is permitted by the school's data protection procedures. Before introducing new AI tools for educational or administrative purposes, the school will undertake an appropriate risk assessment and consider safeguarding, privacy, data protection, filtering and monitoring, cyber security and educational suitability. The school's filtering and monitoring systems apply to the use of AI technologies in the same way as they apply to all other online activity. The school will continue to monitor developments in AI and update its policies, procedures and staff training as technologies and statutory guidance evolve. Pupils will be taught, through the curriculum, how to use AI safely, responsibly and critically, recognising both its educational benefits and its potential safeguarding risks.

9. Notifying Parents or Carers

Where appropriate, the school will discuss safeguarding concerns with a child's parents or carers. The Designated Safeguarding Lead (DSL) will normally lead these discussions where there has been a safeguarding concern, suspicion or disclosure. Other members of staff will only discuss safeguarding concerns with parents or carers following consultation with, or on the advice of, the DSL. The school recognises that, in some circumstances, informing parents or carers before seeking advice from Children's Social Care or the Police could place a child at increased risk of harm, compromise a criminal investigation or prejudice a safeguarding enquiry. In such cases, the DSL will seek advice from Children's Social Care and/or the Police before informing parents or carers. Where allegations involve child-on-child abuse, the school will normally inform the parents or carers of all children involved at an appropriate stage. Careful consideration will be given to the nature and timing of the information shared to ensure that the rights, welfare and confidentiality of all children are protected. The school will work closely with Children's Social Care, the Police and other relevant agencies to ensure that information sharing is lawful, proportionate and consistent with safeguarding requirements.

The DSL, together with relevant agencies where appropriate, will:

- meet with the victim and their parents or carers to discuss the safeguarding measures being put in place, understand their wishes and concerns, and agree appropriate support;
- meet with the parents or carers of the alleged perpetrator to discuss the support available to their child and explain any safeguarding or educational arrangements that affect them, where appropriate; and

Love, Listen and Learn

- keep parents or carers appropriately informed throughout the safeguarding process, unless there is a lawful safeguarding reason why this should not happen.

All decisions regarding communication with parents or carers will be made on a case-by-case basis, taking account of the child's wishes and feelings, the advice of safeguarding agencies, and the school's duty to safeguard and promote the welfare of all children.

10. Pupils with Special Educational Needs, Disabilities or Health Issues

The school recognises that children with special educational needs and disabilities (SEND) or certain medical or health conditions can face additional safeguarding challenges. These children may be more likely to experience abuse, neglect, exploitation or bullying than their peers and may face additional barriers to recognising, reporting or disclosing concerns.

Staff understand that safeguarding incidents involving children with SEND or certain health conditions require particular vigilance, professional curiosity and a child-centred approach.

Additional barriers may include, but are not limited to:

- assumptions that indicators of possible abuse, neglect or exploitation, such as behaviour, mood, injury or presentation, are related to the child's disability or health condition without further exploration;
- increased vulnerability to peer isolation, bullying (including prejudice-based bullying), discrimination or child-on-child abuse;
- children with SEND or certain health conditions being disproportionately affected by bullying, harassment or abuse without outwardly displaying obvious signs;
- communication barriers, including difficulties in expressing concerns, understanding what is happening or seeking help;
- cognitive differences which may affect a child's understanding of relationships, consent, online risks or the difference between fact and fiction; and
- greater dependence on adults for personal care or intimate support, which may increase vulnerability to abuse if appropriate safeguards are not in place.

The school recognises the importance of making reasonable adjustments to safeguarding procedures where necessary to ensure that children with SEND can communicate concerns, understand safeguarding processes and access appropriate support.

We provide additional pastoral support for children with SEND and those with medical or health needs where appropriate. This may include one-to-one support, small group interventions, wellbeing support and referrals to specialist services where required.

Safeguarding concerns involving children with SEND or medical needs will be managed through close collaboration between the Designated Safeguarding Lead (DSL), the Deputy DSL(s), the Special Educational Needs Coordinator (SENCO) and other relevant professionals, ensuring that safeguarding remains the primary consideration at all times.

11. Pupils with a Social Worker

Some children may need a social worker due to safeguarding or welfare needs. Children may be subject to a Child Protection Plan, Child in Need Plan or may have previously had a social worker. The school recognises that experiences of abuse, neglect, adversity and trauma can leave children vulnerable to further harm and may create barriers to attendance, learning, behaviour, relationships and mental health. The Designated Safeguarding Lead (DSL) and all members of staff will work closely with social workers and other relevant agencies to help safeguard and promote the welfare of these children and to improve their educational outcomes. Where the school is aware that a child has a social worker, the DSL will ensure this is taken into account when making decisions that affect the child's safety, welfare and education. This information will be used to support professional decision-making and appropriate information sharing.

This may include decisions relating to:

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- responding to unauthorised absence, persistent absence or children missing education where safeguarding risks are known or suspected;
- the provision of pastoral, emotional and academic support;
- attendance, behaviour and wellbeing support;
- risk assessments and safeguarding planning;
- transitions within school and between educational settings; and
- working collaboratively with parents or carers, social workers and other professionals to achieve the best possible outcomes for the child.

The school recognises the importance of providing a stable, supportive and predictable environment for children with social workers and will work proactively with partner agencies to reduce barriers to learning and help children achieve their full potential.

12. Looked-After and Previously Looked-After Children

The school recognises that looked-after children and previously looked-after children are among the most vulnerable groups of children and may have additional safeguarding, welfare and educational needs. We will ensure that all staff have the skills, knowledge and understanding to safeguard looked-after and previously looked-after children effectively. In particular, we will ensure that:

- appropriate staff have access to relevant information about a child's legal status, care arrangements, contact arrangements and those with parental responsibility, where this information is necessary to safeguard and promote the child's welfare;
- the Designated Safeguarding Lead (DSL) has up-to-date contact details for the child's social worker, the relevant Virtual School Head (VSH) and other professionals involved with the child, where applicable;
- safeguarding information is shared appropriately and lawfully to support effective multi-agency working and promote the child's welfare; and
- all staff understand the particular vulnerabilities that looked-after and previously looked-after children may experience as a result of abuse, neglect, trauma or disrupted attachments.

The school has appointed the **Deputy Headteacher** as the **Designated Teacher** for looked-after and previously looked-after children in accordance with statutory guidance.

The Designated Teacher will receive appropriate training and have the knowledge, skills and experience necessary to fulfil the role effectively. As part of their responsibilities, the Designated Teacher will:

- work closely with the DSL to ensure that safeguarding concerns relating to looked-after and previously looked-after children are identified, recorded and responded to promptly;
- work with the Virtual School Head (VSH), social workers and other professionals to promote the educational achievement, attendance, wellbeing and wider outcomes of looked-after and previously looked-after children;
- contribute to Personal Education Plans (PEPs) and help ensure that Pupil Premium Plus funding is used effectively to meet the identified needs of looked-after children;
- support effective transition planning and educational stability where children move between schools or placements; and
- promote a whole-school culture that recognises the impact of trauma and attachment on children's learning, behaviour and wellbeing.

The school also recognises the extended strategic role of the Virtual School Head in promoting the educational outcomes of children with a social worker and will work collaboratively with the Virtual School where appropriate, while recognising that responsibility for safeguarding remains with the school and relevant safeguarding agencies.

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13. Complaints and Concerns About School Safeguarding Policies

13.1 Complaints Against Staff

Complaints or concerns about the conduct of a member of staff, supply teacher, volunteer, contractor or any other adult working with children that may require a safeguarding or child protection investigation will be managed in accordance with the school's procedures for managing allegations against adults working with children (see **Appendix 3**) and the statutory guidance set out in *Keeping Children Safe in Education 2026*. Low-level concerns that do not meet the threshold for managing allegations against staff will be managed in accordance with the school's relevant Policy.

13.2 Other Complaints

The school follows the recommended guidance of the **Diocese of Westminster** when managing complaints. The school's Complaints Procedure is available on the school website and from the school office. The school's Complaints Co-ordinator is **Mrs Brennan**. Where a complaint relates to safeguarding or child protection, the school will ensure that it is considered promptly and, where appropriate, referred in accordance with this Child Protection and Safeguarding Policy and local safeguarding procedures.

13.3 Whistleblowing

The school is committed to maintaining a culture of openness, transparency and accountability in which all staff feel able to raise concerns about poor or unsafe practice. Staff should refer to the school's separate **Whistleblowing Policy**, which is available from the school office and shared with all staff during induction and regular safeguarding updates. Where staff have concerns that safeguarding issues are not being appropriately addressed, or believe that children may be at risk, they should follow the Whistleblowing Policy without delay. Concerns may be raised within the school or, where appropriate, directly with external agencies in accordance with statutory guidance. No member of staff will suffer detriment for raising a genuine safeguarding concern in good faith.

14. Record-Keeping

The school will create, maintain, store and dispose of safeguarding records in accordance with statutory requirements, data protection legislation and the school's Records Retention Schedule. All safeguarding concerns, discussions, decisions, actions taken and the reasons for those decisions must be recorded promptly, accurately and in writing. This includes occasions where referrals are, or are not, made to Children's Social Care, the Police, Prevent or any other agency. If staff are unsure whether information should be recorded, they should seek advice from the Designated Safeguarding Lead (DSL).

Safeguarding records will include:

- a clear, comprehensive and factual summary of the concern;
- details of how the concern was followed up;
- actions taken, decisions reached, the reasons for those decisions and the outcome; and
- details of any information shared with other agencies or professionals.

A separate child protection file will be maintained for any child about whom there are safeguarding concerns. Safeguarding records will be kept securely, with appropriate access controls, and will only be available to those who have a legitimate safeguarding or professional need to access them. Information will be shared in accordance with data protection legislation and the principles of effective safeguarding information sharing. Safeguarding records relating to individual children will be retained in accordance with the school's Records Retention Schedule and any applicable statutory requirements. Where a child transfers to another school or educational setting, the DSL will ensure that the child protection file is transferred securely, separately from the main pupil record, and confirmation of receipt is obtained from the receiving school. To enable appropriate safeguarding support to be in place when the child starts at their new school, the child protection file should normally be transferred:

- within **five working days** for an in-year transfer; or
- within the **first five working days** of the start of a new term.

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Where safeguarding concerns are particularly significant or complex, and/or Children's Social Care or other agencies are involved, the DSL will speak directly with the Designated Safeguarding Lead at the receiving school to ensure that relevant safeguarding information is shared and appropriate arrangements are in place before the child starts.

- In addition:
- **Appendix 2** sets out the school's procedures for record-keeping relating to safer recruitment and pre-appointment checks.
- **Appendix 3** sets out the school's procedures for record-keeping relating to allegations and concerns about adults working with children.

15. Training

15.1 All Staff

All staff members will receive safeguarding and child protection training as part of their induction. This will include training on the school's safeguarding procedures, staff code of conduct, whistleblowing procedures, behaviour policy, low-level concerns, online safety, filtering and monitoring systems, and the role of the Designated Safeguarding Lead (DSL). Induction and ongoing safeguarding training will ensure that staff understand their safeguarding responsibilities and are able to identify children who may be experiencing abuse, neglect, exploitation or harm.

Safeguarding training will be regularly updated and will:

- be integrated, aligned and considered as part of the whole-school safeguarding approach, wider staff training and curriculum planning;
- reflect local safeguarding partner arrangements and local safeguarding procedures;
- include online safety, including staff responsibilities for filtering and monitoring systems, cyber security awareness, artificial intelligence (AI), misinformation, online abuse and emerging technologies;
- promote professional curiosity and the importance of recognising early indicators of abuse, neglect and exploitation;
- include training on local Family Help arrangements and early intervention processes; and
- have regard to the Teachers' Standards to support the expectation that all teachers:
 - manage behaviour effectively to provide a safe learning environment; and
 - have a clear understanding of the needs of all children, including those who may be vulnerable.

All staff will receive Prevent Duty training to enable them to identify children who may be vulnerable to radicalisation or susceptible to extremist ideologies and know how to respond appropriately. Staff will also receive regular safeguarding and child protection updates, including updates on online safety, local safeguarding issues, emerging risks and changes to statutory guidance, as required and at least annually. Updates may be delivered through staff meetings, briefings, emails, safeguarding bulletins or other appropriate methods. Where appropriate, contractors working regularly on the school site, including those employed through a Private Finance Initiative (PFI) or similar arrangements, will receive safeguarding information and training appropriate to their role. Volunteers will receive safeguarding information, induction and training appropriate to the nature of their role and the level of contact they have with children.

15.2 The Designated Safeguarding Lead and Deputy DSLs

The Designated Safeguarding Lead (DSL) and Deputy DSL(s) will undertake safeguarding and child protection training every two years, in accordance with statutory guidance. In addition, they will update their knowledge and skills at regular intervals, and at least annually, through activities such as safeguarding networks, professional meetings, local authority or safeguarding partner updates, webinars, reading statutory guidance and other continuing professional development opportunities. The DSL and Deputy DSL(s) will also undertake Prevent Duty training and any other specialist safeguarding training necessary to fulfil their responsibilities effectively.

15.3 Governors

All governors will receive safeguarding and child protection training, including online safety, as part of their induction, with regular updates thereafter.

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This training will ensure governors:

- understand their statutory safeguarding responsibilities;
- are able to provide appropriate strategic challenge and oversight;
- understand the school's safeguarding systems, filtering and monitoring arrangements and safer recruitment procedures;
- can assure themselves that safeguarding policies, procedures and training are effective; and
- support the development of a strong whole-school safeguarding culture.

Where the Chair of Governors may act as the case manager for allegations against the Headteacher, they will receive appropriate training for this role.

15.4 Recruitment – Interview Panels

At least one member of every recruitment panel will have completed appropriate safer recruitment training. This training will, as a minimum, cover the requirements of *Keeping Children Safe in Education 2026* and relevant local safeguarding procedures. Further information about the school's safer recruitment procedures can be found in **Appendix 2**.

15.5 Staff Who Have Contact with Pupils and Families

Where appropriate, staff who work directly with children and families will receive regular supervision. Supervision provides opportunities for support, reflection, coaching and professional challenge, promotes the welfare of children and enables confidential discussion of safeguarding concerns and complex cases. Supervision complements, but does not replace, effective line management, safeguarding training and day-to-day support.

16. Monitoring Arrangements

This Child Protection and Safeguarding Policy will be reviewed at least annually by the Headteacher and Senior Leadership Team to ensure it remains compliant with current legislation, statutory guidance, including *Keeping Children Safe in Education*, local safeguarding arrangements and best practice. The policy will also be reviewed and updated whenever there are significant changes to legislation, statutory guidance, local safeguarding procedures or following any safeguarding incident or learning arising from local or national safeguarding reviews where appropriate. Following each review, the policy will be presented to and approved by the Full Governing Board. The Governing Board will monitor the implementation and effectiveness of this policy as part of its strategic responsibility for safeguarding and promoting the welfare of children.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- AI
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Privacy notices

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Appendix 1: Types of Abuse

The definitions below are based on the Department for Education's statutory guidance, *Keeping Children Safe in Education 2026*. Abuse, neglect, exploitation and safeguarding concerns rarely occur in isolation and are often interconnected. In many cases, children may experience multiple forms of abuse at the same time. Abuse can take place in person, online or through a combination of both.

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

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Emotional abuse may involve deliberately conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:

- not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children, including interactions beyond a child's developmental capability, overprotection, limitation of exploration and learning, or preventing participation in normal social interaction;
- seeing or hearing the ill-treatment of another person;
- serious bullying (including cyber-bullying);
- causing children frequently to feel frightened or in danger; or
- the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur on its own.

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

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing; or
- non-contact activities, such as involving children in looking at, or producing, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including online.

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

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.

Neglect may also include a failure to respond to a child's basic emotional needs.

Recruitment and Selection Process

The school is committed to ensuring that all recruitment and selection processes promote the safety and welfare of children and deter, identify and reject unsuitable applicants from working with children.

The Governing Board and Senior Leadership Team recognise that safer recruitment is an essential part of creating a strong safeguarding culture within the school. Safer recruitment procedures are supported by effective induction, safeguarding training, supervision and ongoing vigilance.

To ensure that we recruit suitable people to work with children, all those involved in the recruitment and employment of staff will have received appropriate safer recruitment training in accordance with *Keeping Children Safe in Education 2026*.

The following procedures form part of the school's safer recruitment process.

Advertising

When advertising vacancies, we will make clear:

- the school's commitment to safeguarding and promoting the welfare of children;
- that safeguarding and pre-employment checks will be undertaken;
- the safeguarding responsibilities and expectations of the role, including the extent of contact with children;
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended); and
- that the school may carry out an online search as part of its due diligence on shortlisted candidates, in accordance with *Keeping Children Safe in Education 2026*.

Application Forms

Our application forms will:

- include a statement explaining that it is an offence to apply for a role involving regulated activity with children if the applicant is barred from engaging in such activity;
- include a copy of, or link to, the school's Child Protection and Safeguarding Policy and the school's policy on the employment of ex-offenders;
- require applicants to provide a full employment history and explain any gaps in employment; and
- make clear that providing false information or deliberately omitting relevant information may result in an application being rejected, withdrawal of an offer of employment, dismissal or referral to the appropriate authorities where applicable.

Shortlisting

Our shortlisting process will be carried out by at least two people and will:

- consider any inconsistencies, discrepancies or gaps in employment history and explore the reasons given for them;
- identify and explore any potential safeguarding concerns or anomalies arising from the application;
- ensure that candidates meet the essential requirements of the role before being invited to interview.

Once candidates have been shortlisted, we will ask them to:

- complete a self-declaration of their criminal record and any information that may make them unsuitable to work with children, giving them the opportunity to disclose relevant information and discuss this during the recruitment process.

The information requested may include:

- whether they have a criminal history;

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- whether they are included on the Children's Barred List;
- whether they are prohibited from teaching or subject to any prohibition, direction, sanction or restriction that would prevent them from working with children;
- information about any criminal offences committed in any country, in accordance with the law applicable in England and Wales;
- any relevant overseas criminal record or professional conduct information;
- whether they are known to the police or Children's Social Care;
- whether they have been disqualified from providing childcare; and
- any other information relevant to assessing their suitability to work with children.

Candidates will be required to sign a declaration confirming that the information they have provided is true, complete and accurate.

As part of our due diligence process, the school will carry out an online search of shortlisted candidates. Candidates will be informed that these searches will be undertaken.

The purpose of the online search is to identify any incidents or issues that are publicly available online which may be relevant to the candidate's suitability to work with children. Any information identified will be considered fairly, proportionately and in the context of the role. Where appropriate, candidates will be given the opportunity to discuss any relevant findings during the recruitment process.

Seeking References and Checking Employment History

References will be obtained before interview wherever possible. Any concerns identified through references will be explored with the referee and discussed with the candidate during the recruitment process before any appointment is confirmed.

When seeking references, we will:

- not accept open or unsolicited references;
- obtain references directly from the referee and verify that they are genuine;
- ensure that references are provided by the candidate's current employer and completed by a senior person with appropriate authority. Where the referee is from a school or college, we will seek confirmation from the Headteacher or Principal, where appropriate, that the reference accurately reflects any disciplinary investigations or concerns relating to the safety and welfare of children;
- obtain verification of the candidate's most recent relevant period of employment where they are not currently employed;
- obtain a reference from the employer for whom the candidate most recently worked with children, where they are no longer working with children;
- compare the information provided in the reference with the application form and employment history, investigating any discrepancies or inconsistencies;
- seek clarification of any concerns relating to safeguarding, suitability to work with children or employment history; and
- ensure that all concerns are satisfactorily resolved before any appointment is confirmed.

Interview and Selection

The interview process will assess each candidate's suitability to work with children as well as their ability to fulfil the requirements of the role.

During the interview, we will:

- explore any gaps in employment history or frequent changes in employment or location and require candidates to explain these satisfactorily;
- discuss any discrepancies identified during the application, reference or online search process;
- explore any safeguarding concerns or other information relevant to the candidate's suitability to work with children;
- assess the candidate's attitudes towards safeguarding, child protection and professional conduct; and

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- record the questions asked, information considered, decisions reached and the reasons for those decisions as part of the recruitment process.

Pre-Appointment Vetting Checks

The school will record all required pre-employment checks in the **Single Central Record (SCR)** in accordance with statutory requirements. Where appropriate, evidence of these checks will be retained securely within individual personnel files in line with data protection legislation and the school's Records Retention Schedule. The SCR will be maintained accurately, reviewed regularly and monitored by senior leaders and governors as part of the school's safeguarding arrangements.

New Staff

All offers of employment will be conditional upon the satisfactory completion of all required pre-employment checks.

When appointing new staff, the school will:

- verify the applicant's identity;
- obtain an enhanced Disclosure and Barring Service (DBS) certificate, including Children's Barred List information for those engaging in regulated activity (see definition below);
- obtain the DBS certificate before appointment or, where this is not possible, as soon as practicable afterwards, including where the DBS Update Service is used;
- obtain a separate Children's Barred List check where an individual will begin work in regulated activity before the enhanced DBS certificate has been received;
- verify the applicant's right to work in the United Kingdom and retain evidence in accordance with statutory requirements;
- verify the applicant's medical fitness to carry out the duties of the post in accordance with relevant employment legislation;
- verify professional qualifications where these are required for the role;
- ensure that teachers are not subject to a prohibition order or any other restriction that prevents them from carrying out teaching work;
- carry out any additional checks required for individuals who have lived or worked outside the United Kingdom. These may include overseas criminal record checks, professional conduct checks and other appropriate safeguarding enquiries where information is available; and
- complete any other checks required by *Keeping Children Safe in Education 2026* or other relevant legislation.

The school will not retain copies of DBS certificates for longer than six months. However, a record will be retained confirming that the appropriate vetting checks have been completed, together with the date of the check, the outcome and the recruitment decision. Where applicable, the school will carry out checks under the Childcare Act 2006 and the Childcare (Disqualification) Regulations and maintain a written record where it is determined that an individual falls outside the scope of these requirements, including any risk assessment undertaken and advice received.

Regulated Activity

For the purposes of safeguarding and DBS checking, regulated activity includes individuals who:

- are responsible, on a regular basis, for teaching, training, instructing, caring for or supervising children;
- carry out paid, or unsupervised unpaid, work regularly in a school or college that provides an opportunity for contact with children; or
- provide intimate or personal care or overnight supervision of children, even where this occurs only once.

Existing Staff

The school may undertake the same pre-employment checks on existing members of staff where appropriate. This may include circumstances where:

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- there are concerns about an individual's suitability to work with children;
- an individual moves from a role that is not regulated activity into one that is;
- there has been a break in service of 12 weeks or more; or
- further safeguarding information comes to light requiring additional checks.

Where the legal threshold is met, the school has a statutory duty to make a referral to the Disclosure and Barring Service (DBS) where an individual has harmed, or poses a risk of harm to, a child or vulnerable adult and:

- has engaged in relevant conduct;
- has received a caution or conviction for a relevant offence under the Safeguarding Vulnerable Groups Act 2006;
- satisfies the statutory harm test; and
- has been removed from regulated activity (paid or unpaid), or would have been removed had they not resigned, retired or otherwise left their post.

Agency and Third-Party Staff

The school will obtain written confirmation from any employment agency or third-party organisation that it has carried out all safer recruitment and pre-employment checks required by *Keeping Children Safe in Education 2026*. Before any agency or third-party worker begins work at the school, we will:

- obtain written confirmation that all required safer recruitment checks have been completed;
- verify the identity of the individual presenting for work to ensure they are the person on whom the checks have been carried out;
- ensure that they receive appropriate safeguarding information and understand the school's safeguarding procedures, including how to report concerns; and
- ensure appropriate supervision is in place where necessary.

Contractors

The school will ensure that any contractor, or employee of a contractor, working on the school site has undergone the appropriate level of DBS checking. This includes contractors supplied through a Private Finance Initiative (PFI) or similar arrangement.

This will normally include:

- an enhanced DBS check with Children's Barred List information for contractors engaged in regulated activity; or
- an enhanced DBS check, without Children's Barred List information, where contractors are not engaged in regulated activity but have regular opportunities for contact with children.

The school will obtain the appropriate DBS check for self-employed contractors where required. Copies of DBS certificates will not be retained for longer than six months. A record of the checks undertaken and the recruitment decision will be retained in accordance with statutory requirements. Contractors who have not completed the appropriate checks will not be permitted to work unsupervised or undertake regulated activity under any circumstances. The identity of all contractors and their employees will be verified on arrival at the school. All contractors will receive safeguarding information appropriate to their role, including information about reporting safeguarding concerns whilst working on the school site. Where applicable, the school will carry out checks under the Childcare Act 2006 and the Childcare (Disqualification) Regulations. Where an individual is considered to fall outside the scope of these requirements, the school will retain a written record of the assessment, including any risk assessment undertaken and advice received.

Trainee/Student Teachers

Where applicants for initial teacher training are employed by the school, all statutory safer recruitment and pre-employment checks will be completed by the school before they begin work. Where trainee teachers are fee-funded, the school will obtain written confirmation from the initial teacher training provider that all required

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safeguarding and pre-employment checks have been completed and that the trainee has been assessed as suitable to work with children.

In both cases, this includes ensuring compliance with the Childcare Act 2006 and the Childcare (Disqualification) Regulations, where applicable. All trainee and student teachers will receive an appropriate safeguarding induction, understand the school's safeguarding procedures and know how to report any safeguarding concerns during their placement.

Volunteers

The school values the contribution made by volunteers and will ensure that appropriate safeguarding arrangements are in place.

We will:

- never leave an unchecked volunteer unsupervised or permit them to engage in regulated activity;
- obtain an enhanced Disclosure and Barring Service (DBS) check, including Children's Barred List information, for all volunteers who undertake regulated activity;
- carry out a written risk assessment when deciding whether an enhanced DBS check (without Children's Barred List information) is required for volunteers who are not undertaking regulated activity, retaining a record of the assessment;
- ensure that volunteers receive appropriate safeguarding information, understand the school's Child Protection and Safeguarding Policy and know how to report safeguarding concerns;
- provide volunteers with appropriate supervision and support throughout their time in school; and
- where applicable, carry out checks required under the Childcare Act 2006 and the Childcare (Disqualification) Regulations. Where an individual falls outside the scope of these requirements, the school will retain a written record of its assessment, including any risk assessment undertaken and advice received.

Governors

All governors will undergo an enhanced DBS check without Children's Barred List information. Governors who engage in regulated activity will also undergo an enhanced DBS check including Children's Barred List information. All governors will also undergo:

- a Section 128 check to confirm they are not prohibited from participating in the management of an independent school or from serving as a governor of a maintained school under the Education and Skills Act 2008, where applicable;
- identity checks;
- right to work checks where required; and
- any additional safeguarding checks considered necessary where they have lived or worked outside the United Kingdom.

Governors will receive safeguarding and child protection training, including online safety, appropriate to their strategic safeguarding responsibilities.

Staff Working in Alternative Provision Settings

Where the school places a pupil with an alternative provision provider, we will obtain written confirmation that the provider has carried out the appropriate safeguarding and pre-employment checks on all relevant staff. The school will also seek assurance that appropriate safeguarding arrangements, information-sharing procedures and attendance monitoring systems are in place to safeguard pupils attending alternative provision.

Adults Who Supervise Pupils on Work Experience

When arranging work experience placements, the school will ensure that suitable safeguarding arrangements are in place to protect children from harm. The school will consider, on a case-by-case basis, whether a Children's Barred List check is required for individuals supervising pupils under the age of 16 during work experience. This decision will take account of:

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- the nature of the placement;
- the level and frequency of supervision;
- whether the activity amounts to regulated activity; and
- the individual circumstances of the placement.

Appropriate risk assessments will be completed where required to ensure that pupils remain safe throughout their work experience placement.

Pupils Staying with Host Families

Where the school arranges for pupils to be provided with care and accommodation by a host family to whom they are not related (for example, during a foreign exchange visit), the school will ensure that appropriate safeguarding arrangements are in place. Where required by statutory guidance, the school will request enhanced Disclosure and Barring Service (DBS) checks, including Children's Barred List information, for members of the host family. Where the school organises hosting arrangements overseas and equivalent DBS checks cannot be obtained, we will work closely with our partner schools and organisations to obtain appropriate safeguarding assurances, carry out proportionate risk assessments and ensure that suitable safeguarding arrangements are in place before the visit takes place. The school will ensure that all hosting arrangements are planned and managed in accordance with *Keeping Children Safe in Education 2026* and any other relevant statutory guidance applicable to educational visits and exchange programmes.

Appendix 3: Allegations of Abuse Made Against Staff

Section 1: Allegations That May Meet the Harm Threshold

This section applies to all cases in which it is alleged that a current or former member of staff, including a supply teacher, volunteer, contractor or any other adult working with children, has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes behaviour occurring both inside and outside the school, including online behaviour where relevant.

If there is any doubt about whether a concern meets the harm threshold, the school will seek advice from the Local Authority Designated Officer (LADO) without delay. The school will deal with all allegations promptly, fairly and consistently, providing effective protection for children while ensuring that the rights of the individual who is the subject of the allegation are respected. The welfare of the child remains the paramount consideration throughout the process. All allegations will be managed in accordance with *Keeping Children Safe in Education 2026*, local safeguarding procedures and relevant employment legislation.

A **Case Manager** will be appointed at the earliest opportunity to oversee the management of the allegation. This will normally be the Headteacher. Where the allegation concerns the Headteacher, the Chair of Governors will act as the Case Manager. The Case Manager will work closely with the LADO and, where appropriate, the Police, Children's Social Care, Human Resources and other relevant agencies throughout the process. All allegations will be handled with appropriate confidentiality. Information will only be shared with those who have a legitimate professional need to know in order to protect children, ensure a fair investigation and comply with legal obligations. The school's procedures for managing allegations will always be applied using professional judgement, proportionality and common sense.

Suspension of the Individual

Suspension will not be the default response when an allegation is made. It will only be considered where there is reason to believe that:

- a child or children may be at risk of harm;
- the allegation is sufficiently serious that dismissal may be a possible outcome; or
- allowing the individual to remain at work could compromise the investigation.

Before any decision to suspend is made, the Case Manager will consider all reasonable alternatives, taking account of the welfare of the child, the rights of the individual concerned and the operational needs of the school.

Alternatives to suspension may include:

- redeploying the individual so they do not have direct contact with the child or children concerned;
- providing additional supervision whenever the individual is working with children;
- redeploying the individual to duties that do not involve unsupervised access to children;
- moving the child or children to alternative classes or teaching arrangements where appropriate, ensuring this is not viewed as a punishment and following discussion with parents or carers where appropriate; or
- temporarily redeploying the individual to another suitable role or location.

The Case Manager will seek advice from the Local Authority Designated Officer (LADO), Human Resources advisers, and, where appropriate, the Police and Children's Social Care before making decisions about suspension whenever practicable.

Definitions of Outcomes Following Allegation Investigations

Allegations will be categorised using the following statutory definitions:

Substantiated – there is sufficient evidence to prove the allegation.

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- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the individual who is 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** – there is no evidence or proper basis to support the allegation being made.

Procedure for Dealing with Allegations

Where an allegation meets the harm threshold, the Case Manager will take the following steps:

- conduct initial enquiries, in accordance with local procedures, to establish the basic facts and determine whether there is any foundation to the allegation. These enquiries will not amount to a formal investigation and will not compromise any subsequent police or Children's Social Care enquiries;
- discuss the allegation promptly with the Local Authority Designated Officer (LADO) to consider the nature, content and context of the allegation, agree the appropriate course of action, determine whether further enquiries are required and decide whether the Police and/or Children's Social Care should be involved. In exceptional circumstances where there is an immediate risk to children or evidence of a criminal offence, the Police may be contacted before the LADO. In such cases, the LADO will be informed as soon as reasonably practicable;
- inform the individual who is the subject of the allegation of the concerns and the likely course of action as soon as possible, following consultation with the LADO and, where appropriate, the Police and/or Children's Social Care. Information will only be shared where it is appropriate to do so and where this will not prejudice any investigation;
- consider, following discussion with the LADO and other relevant agencies, whether suspension is necessary or whether suitable alternative arrangements can be implemented to safeguard children while the investigation proceeds;
- where there are concerns about the welfare of other children, members of the individual's family or others within the community, discuss these concerns with the Designated Safeguarding Lead (DSL) and ensure appropriate safeguarding action is taken, including referrals to Children's Social Care where necessary;
- where immediate suspension is considered necessary, record the reasons for the decision, including all alternatives considered and why they were not appropriate. Written confirmation of the suspension will normally be provided within one working day, together with details of a named school contact who will provide support and updates;
- where it is decided that no further action will be taken, record the decision and the reasons for it, agree with the LADO what information will be shared with the individual concerned and any other relevant parties, and determine whether any further action or learning is required;
- where further action is required, implement the agreed course of action in partnership with the LADO, Police, Children's Social Care and any other relevant agencies;
- provide appropriate welfare and professional support to the individual who is the subject of the allegation throughout the process, including identifying a named contact to provide information and support; and
- ensure that comprehensive, accurate and confidential records are maintained throughout the management of the allegation in accordance with statutory guidance and the school's record retention procedures.

Parents or carers of the child or children involved will be informed of the allegation as soon as possible, provided that doing so will not place a child at increased risk of harm or prejudice any investigation. Where the Police or Children's Social Care are involved, information will only be shared following agreement with those agencies. Parents and carers will be reminded of the requirement to maintain appropriate confidentiality while investigations are ongoing and advised to seek independent legal advice if they wish to challenge any statutory reporting restrictions. Throughout the process, parents or carers will be kept appropriately informed about the progress of the case in relation to their own child. Confidential information relating to the individual who is the subject of the allegation will not be shared.

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Where the legal threshold is met, the school will make a referral to the Disclosure and Barring Service (DBS) where an individual has harmed, or poses a risk of harm to, a child, in accordance with statutory requirements.

The school will notify Ofsted of any allegations of serious harm or abuse involving any person living, working or caring for children on the premises, and of any action taken, as soon as reasonably practicable and, where required, within the statutory timescales.

If the school becomes aware that the Secretary of State has made an interim prohibition order in respect of a teacher, that individual will be removed from teaching duties immediately pending the outcome of the Teaching Regulation Agency's investigation.

Where the Police are involved, the school will, wherever practicable, request that consent is sought from those involved to allow statements and evidence to be shared for any subsequent disciplinary proceedings where appropriate and lawful.

Additional Considerations for Supply Teachers and All Contracted Staff

Where safeguarding concerns or allegations relate to an individual who is not directly employed by the school, such as a supply teacher or contracted member of staff provided by an agency, the school will apply the same safeguarding standards and procedures as for directly employed staff.

In addition to the procedures outlined above, the school will:

- not cease to use an individual solely because an allegation has been made, without first establishing the facts and consulting the Local Authority Designated Officer (LADO) to determine the most appropriate course of action;
- work closely with the employment agency or contractor to determine whether the individual should be suspended, redeployed or have their duties adjusted while enquiries are ongoing, taking account of advice from the LADO;
- take the lead in managing safeguarding concerns arising within the school, including gathering relevant information and sharing it with the LADO and other agencies as appropriate;
- ensure that relevant safeguarding information is shared appropriately with the employment agency or contractor so that any previous concerns, patterns of behaviour or allegations can be taken into account when assessing risk and determining appropriate action;
- maintain clear, accurate and confidential records of all discussions, decisions and actions taken throughout the process.

When engaging agency staff or contractors, the school will ensure that the provider is aware of the school's procedures for managing allegations and safeguarding concerns. The school will work collaboratively with the agency throughout any investigation and may invite the agency's Human Resources representative or equivalent to attend relevant meetings where appropriate.

Timescales

The school will deal with all allegations as quickly, fairly and effectively as possible, recognising that timely action is in the best interests of children, staff and all parties involved. Where reasonably practicable, the school will aim to achieve the following timescales:

- allegations that are clearly false, unfounded, unsubstantiated or malicious will be resolved as quickly as possible and, where appropriate, within one week;
- where the allegation does not require formal disciplinary action, appropriate action will normally be completed within three working days; and
- where a disciplinary hearing is required and no further investigation is necessary, the hearing will normally take place within 15 working days.

These timescales are intended as good practice objectives rather than statutory deadlines. Where circumstances mean they cannot be achieved, the school will continue to progress the case without unnecessary delay, working closely with the LADO, Police, Children's Social Care and other relevant agencies to ensure the matter is concluded as promptly as possible.

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Specific Actions

Action Following a Criminal Investigation or Prosecution

Following the conclusion of any police investigation or criminal proceedings, the Case Manager will consult with the Local Authority Designated Officer (LADO) to determine whether any further action is required. This may include consideration of disciplinary procedures, employment action or other safeguarding measures, taking account of information provided by the Police, Children's Social Care and any other relevant agencies.

Conclusion of a Case Where the Allegation is Substantiated

Where an allegation is substantiated and the individual is dismissed, the school ceases to use their services, or the individual resigns or otherwise leaves before the case is concluded, the school will consider its statutory duty to make a referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the Children's Barred List. Where the individual is a qualified teacher, the school will also consider whether a referral should be made to the Teaching Regulation Agency (TRA) for consideration of a prohibition order. The school will comply with all statutory reporting duties and retain appropriate records of any referrals made.

Individuals Returning to Work Following Suspension

Where it is decided that an individual who has been suspended may return to work, the Case Manager will carefully consider how best to facilitate their return. This will include consideration of:

- the welfare and best interests of the child or children involved;
- the support required by the individual returning to work;
- any professional development, supervision or monitoring that may be appropriate;
- communication arrangements with staff where necessary and appropriate; and
- how future contact between the individual and the child or children involved should be managed, where they remain at the school.

The school will seek to ensure that any return to work is managed sensitively, fairly and in a manner that safeguards all parties.

Unsubstantiated, Unfounded, False or Malicious Allegations

Where an allegation is determined to be unsubstantiated, unfounded, false or malicious, the Case Manager and the Local Authority Designated Officer (LADO) will consider the most appropriate next steps. Where there are concerns that the child or other person making the allegation may require additional help or support, or where the allegation may have represented a cry for help, the Designated Safeguarding Lead (DSL) will consider whether a referral to Children's Social Care or other appropriate support services is required. Where an allegation is found to have been deliberately invented or made maliciously, the school will consider whether any appropriate action should be taken in relation to the individual responsible, taking account of their age, understanding, circumstances and any underlying safeguarding or welfare needs. Any decision regarding disciplinary action will be proportionate, child-centred and made in accordance with the school's Behaviour Policy, staff procedures and relevant statutory guidance.

Confidentiality and Information Sharing

The school will make every reasonable effort to maintain confidentiality and protect all parties from unnecessary publicity while an allegation is being considered or investigated. The Case Manager will seek advice from the Local Authority Designated Officer (LADO), the Police and Children's Social Care, where appropriate, to agree:

- who needs to know about the allegation and what information can be shared;
- how to manage speculation, leaks and gossip, including reminding parents or carers of the importance of maintaining confidentiality where appropriate;
- what information, if any, can be shared with the wider school community in order to reduce speculation while protecting confidentiality; and
- how any media or press enquiries will be managed.

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Information will only be shared on a need-to-know basis and in accordance with data protection legislation, statutory safeguarding guidance and the school's Information Sharing procedures.

Record Keeping

The Case Manager will maintain clear, accurate, factual and confidential records of any allegation or concern that meets the harm threshold. These records will be stored securely on the individual's confidential personnel file for the duration of the case. Where an allegation is found to be malicious or false, records relating to the allegation will be removed from the individual's personnel file unless the individual concerned provides informed consent for them to be retained. For all other allegations that are not found to be malicious or false, the school will retain:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was investigated and resolved;
- a record of all decisions reached, actions taken and the outcome; and
- a record of whether the information will be referred to in any future employment reference.

Subject to any restrictions imposed by the Police or Children's Social Care, the school will provide the individual concerned with a copy of the relevant records where appropriate. Records will be retained securely in accordance with statutory safeguarding guidance, data protection legislation and the school's Records Retention Schedule.

References

When providing employment references, the school will:

- not refer to allegations that have been found to be false, unfounded, unsubstantiated or malicious, including repeated allegations that have all been determined to be false, unfounded, unsubstantiated or malicious; and
- include factual information relating to substantiated safeguarding allegations where it is lawful, relevant and appropriate to do so, ensuring that opinions or unsubstantiated information are not included.

References will be accurate, fair, objective and comply with statutory safeguarding guidance and employment law.

Learning Lessons

Following any case where an allegation is substantiated, the Case Manager will review the circumstances of the case with the Local Authority Designated Officer (LADO) to determine whether there are lessons to be learned and whether any improvements should be made to the school's safeguarding policies, procedures, practice or training. This review will, where appropriate, include consideration of:

- the decision to suspend the individual;
- the duration of any suspension;
- whether suspension was justified and proportionate;
- whether suitable alternatives to suspension could have been used;
- whether safeguarding procedures and reporting arrangements operated effectively;
- whether any additional safeguarding training, supervision or policy changes are required; and
- any wider organisational learning that may help prevent similar incidents in the future.

For all other cases, including those that are unsubstantiated, unfounded, false or malicious, the Case Manager will consider whether there are any lessons to be learned or improvements that should be made to safeguarding practice, procedures, staff training or risk management. Where appropriate, learning from allegations will be reflected in the school's safeguarding arrangements, staff training programme and annual review of safeguarding policies.

Non-recent Allegations

Allegations of abuse may be made at any time, regardless of when the alleged incident occurred. The school

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recognises that non-recent allegations must be treated seriously and managed in accordance with current safeguarding procedures. Where a child makes a non-recent allegation of abuse, the school will report the matter to the Local Authority Designated Officer (LADO) in accordance with local safeguarding procedures. Where an adult reports that they were abused as a child, the school will advise them to report the matter to the Police. Where appropriate, the school will also signpost the individual to relevant support services and consider whether any current safeguarding risks to children require referral to Children's Social Care or other relevant agencies. All non-recent allegations will be handled sensitively, fairly and in accordance with *Keeping Children Safe in Education 2026*, recognising that historic allegations may still indicate current safeguarding risks.

Section 2: Concerns That Do Not Meet the Harm Threshold

This section applies to all concerns (including allegations) relating to adults working in or on behalf of the school, including employees, supply teachers, volunteers, contractors, governors, trainees and agency staff, which do not meet the harm threshold described in Section 1.

Concerns may arise through a variety of sources, including:

- observations by colleagues or leaders;
- a complaint;
- a safeguarding concern or allegation raised by another member of staff;
- a disclosure made by a child, parent, carer or another adult within or outside the school;
- information identified through safer recruitment or pre-employment checks;
- self-reporting by an individual; or
- any other information that gives rise to concern about professional conduct.

The school recognises the importance of responding promptly, proportionately and fairly to all concerns in order to safeguard children, maintain high professional standards and promote a positive safeguarding culture.

Definition of Low-Level Concerns

A 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 school's Staff Code of Conduct, including behaviour outside work that may affect their suitability to work with children; and/or
- does not meet the harm threshold for referral to the Local Authority Designated Officer (LADO), but may indicate that professional boundaries have not been maintained.

Examples of low-level concerns may include, but are not limited to:

- being overly familiar or overly friendly with children;
- showing favouritism towards individual pupils;
- using a personal mobile phone or personal device to take photographs of children;
- meeting with a child on a one-to-one basis in an inappropriate location or behind a closed door without good reason;
- humiliating, intimidating or belittling pupils;
- using inappropriate language or humour; or
- any other conduct that may be inconsistent with the Staff Code of Conduct or the expected professional standards of the school.

Sharing Low-Level Concerns

The school is committed to creating and maintaining a culture of openness, transparency and trust in which all adults feel confident to raise low-level concerns promptly and confidentially. We will promote this culture by:

- ensuring all staff understand the standards of professional behaviour expected of them through induction, regular safeguarding training and the Staff Code of Conduct;

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- helping staff distinguish between appropriate professional behaviour and behaviour that may be concerning, problematic or inappropriate;
- encouraging all staff to report low-level concerns promptly in accordance with Section 7.7 of this policy;
- encouraging individuals to self-report where they recognise that their own behaviour may have fallen below the expected professional standard;
- responding to concerns in a proportionate, fair, timely and supportive manner;
- addressing unprofessional behaviour at the earliest opportunity to prevent escalation;
- identifying patterns of concerning behaviour that may indicate a wider safeguarding risk;
- maintaining appropriate records of low-level concerns in accordance with the school's procedures; and
- using information from low-level concerns to strengthen safeguarding practice, staff training and the school's safeguarding culture.

Responding to Low-Level Concerns

Where a low-level concern is raised by a third party, the Headteacher (or, where appropriate, the Chair of Governors if the concern relates to the Headteacher) will gather sufficient information to establish the facts before determining the appropriate response.

Where appropriate, this may include speaking:

- directly with the person who raised the concern, unless it has been raised anonymously;
- with the individual who is the subject of the concern; and
- with any relevant witnesses.

The Headteacher will consider the information gathered alongside the school's Staff Code of Conduct, safeguarding procedures and any previous concerns or relevant records before determining the appropriate course of action.

The Headteacher will normally be the decision-maker in relation to low-level concerns, although advice may be sought from the Designated Safeguarding Lead (DSL), Human Resources, the Local Authority Designated Officer (LADO) or other appropriate professionals where necessary.

Where information indicates that a concern may meet, or has escalated to meet, the harm threshold described in Section 1 of this appendix, the matter will be managed immediately under the procedures for allegations that meet the harm threshold.

Record Keeping

All low-level concerns will be recorded in writing. Records will include:

- details of the concern;
- the context in which the concern arose;
- any enquiries undertaken;
- decisions reached and the reasons for those decisions; and
- any action taken, support provided or follow-up required.

Records will be:

- kept confidential, stored securely and processed in accordance with the Data Protection Act 2018, UK GDPR and the school's Records Retention Schedule;
- reviewed regularly so that any patterns of concerning, problematic or inappropriate behaviour can be identified and acted upon at an early stage;
- used to inform safeguarding practice, supervision and staff training where appropriate; and
- retained at least until the individual leaves employment with the school, unless a longer retention period is required by statutory guidance.

Where a pattern of behaviour suggests that the harm threshold may have been met, the matter will be referred to the Local Authority Designated Officer (LADO) without delay and managed under the procedures set out in Section 1 of this appendix.

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Where a low-level concern relates to a supply teacher, agency worker or contractor, the school will notify the individual's employer or agency, where appropriate, so that any wider safeguarding concerns or patterns of behaviour can be considered.

References

Low-level concerns will not normally be included in employment references. However, relevant information may be included where:

- the concern, or a pattern of concerns, has met the threshold for referral to the Local Authority Designated Officer (LADO) and has been substantiated; and/or
- the concern relates to matters that would ordinarily be disclosed in an employment reference, such as substantiated misconduct, disciplinary findings or poor professional performance.

Employment references will be accurate, fair, factual and provided in accordance with statutory safeguarding guidance and employment law.

Appendix 4: Specific Safeguarding Issues

Assessing Adult-Involved Nude and Semi-nude Sharing Incidents

All incidents involving the sharing of nude or semi-nude images where an adult is involved are child sexual abuse offences and must be treated as a safeguarding concern requiring immediate referral to the Police and Children's Social Care. However, some adult-involved incidents may initially appear to be child-on-child nude or semi-nude sharing. Schools should therefore remain professionally curious and carefully assess whether an adult may be involved before determining the appropriate response. There are two common categories of adult-involved incidents:

- sexually motivated incidents; and
- financially motivated incidents (including financially motivated sexual extortion or "sextortion").

Sexually Motivated Incidents

In these cases, an adult offender obtains nude or semi-nude images directly from a child or young person through online communication. The offender may make initial contact using their own identity or a false identity, frequently pretending to be another child or young person in order to gain trust. Grooming may take place through social media platforms, online gaming, livestreaming services or chatrooms before moving conversations to private messaging applications or end-to-end encrypted (E2EE) platforms. To encourage a child or young person to create and share nude or semi-nude images, offenders may:

- share pornography;
- share child sexual abuse material (including images of other children);
- use AI-generated or digitally manipulated images;
- manipulate, groom or emotionally coerce the child; or
- exploit the child's trust, curiosity or emotional vulnerability.

Once a child or young person has shared a nude or semi-nude image, the offender may attempt to obtain additional images or sexual acts through threats, intimidation, coercion or blackmail, including threatening to distribute images to family members, friends, schools or online communities. Potential indicators of adult grooming or coercion include a child or young person:

- being contacted online by someone they do not know who claims to be another child or young person;
- being drawn rapidly into sexually explicit conversations or receiving unsolicited sexual images;
- being encouraged to move conversations from public platforms to private or end-to-end encrypted (E2EE) messaging services;
- being pressured, manipulated or coerced into creating or sharing nude or semi-nude images;
- being offered money, gifts, gaming credits or other incentives in exchange for images; or
- being threatened, intimidated or blackmailed into producing further images or engaging in additional sexual activity. This may occur after the child has shared an image or where an offender has created or used digitally manipulated or AI-generated images to extort genuine images.

All suspected adult-involved incidents should be treated as safeguarding concerns requiring immediate referral in accordance with the school's Child Protection and Safeguarding Policy and current statutory guidance.

Financially Motivated Incidents

Financially motivated sexual extortion (commonly referred to as "**sextortion**") is an adult-involved safeguarding incident in which an adult offender, or organised group of offenders, threatens to share nude or semi-nude images of a child or young person unless they pay money or carry out another action for the offender's benefit. Unlike many other adult-involved incidents, financially motivated sexual extortion is often perpetrated by organised criminal groups operating internationally and motivated solely by financial gain. Adults may also be targeted using similar methods. Offenders frequently use false identities, sometimes pretending to be another child or young person, or may gain unauthorised access to an existing account belonging to a young person in order to establish contact.

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To facilitate financial extortion, offenders may:

- groom or coerce a child or young person into creating and sharing nude or semi-nude images before demanding money;
- obtain existing images by hacking or unlawfully accessing the child's online accounts;
- create or use digitally manipulated or AI-generated images of the child or young person; or
- threaten to distribute images to family members, friends, schools or online platforms unless their demands are met.

An offender may demand money, cryptocurrency, gift cards, bank account details or require the child or young person to use their bank account to facilitate money laundering or other criminal activity. Potential indicators of financially motivated sexual extortion include a child or young person:

- being contacted online by someone they do not know who claims to be another child or young person, including through a compromised or hacked account;
- being drawn rapidly into sexually explicit conversations, often with the offender sending an image first;
- being encouraged to move conversations from public platforms to private or end-to-end encrypted (E2EE) messaging services;
- being pressured or manipulated into creating nude or semi-nude images;
- being told that their online accounts have been hacked or that the offender has access to their images, contacts or personal information; or
- being blackmailed into sending money, providing financial information or allowing access to financial accounts following the sharing of an image or the creation of manipulated images.

All suspected incidents of financially motivated sexual extortion must be treated as child sexual abuse and referred immediately in accordance with the school's safeguarding procedures.

Children Missing from Education

A child who is missing from education, particularly where this occurs repeatedly or alongside persistent absence, may be at increased risk of abuse, neglect or exploitation. Children missing education may be vulnerable to a range of safeguarding concerns, including:

- child sexual abuse;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE);
- mental health difficulties;
- substance misuse;
- radicalisation;
- female genital mutilation (FGM);
- forced marriage; and
- other forms of abuse or neglect.

Some children are particularly vulnerable to becoming missing from education, including those who:

- are at risk of abuse or neglect;
- are at risk of forced marriage or female genital mutilation (FGM);
- are from Gypsy, Roma or Traveller communities;
- are from families of service personnel;
- have gone missing from home or care;
- are involved with the youth justice system;
- stop attending school regularly or experience persistent absence; or
- are from newly arrived migrant families.

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The school will follow its attendance procedures and local authority protocols for children missing from education, paying particular attention to repeated absence, persistent absence and any emerging safeguarding concerns. Where a child leaves the school without another school being identified, the school will notify the Local Authority in accordance with statutory requirements and complete all admission and deletion procedures in line with the Education (Pupil Registration) Regulations and local authority guidance.

All staff will receive appropriate safeguarding training to recognise indicators that missing education may be linked to abuse, neglect or exploitation, including child sexual exploitation, child criminal exploitation, forced marriage, female genital mutilation (FGM), radicalisation or travel to conflict zones.

Where there are concerns that a child may be suffering, or is likely to suffer, significant harm, the school will make an immediate referral to Children's Social Care and, where appropriate, the Police, in accordance with the school's Child Protection and Safeguarding Policy.

The school will work proactively with families, attendance services and partner agencies to reduce the risk of children becoming missing from education and to promote regular attendance as an important safeguarding measure.

Child Criminal Exploitation

Child Criminal Exploitation (CCE) is a form of abuse in which an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, for the financial or other benefit of the perpetrator or facilitator, or through violence or the threat of violence.

CCE may be perpetrated by males or females, adults or children. It may occur as a one-off incident or as part of a pattern of organised and persistent exploitation.

A child may be criminally exploited even where the activity appears to be consensual. CCE does not always involve physical contact and may take place both online and offline. Examples include, but are not limited to:

- county lines drug trafficking;
- transporting drugs, money or weapons;
- forced shoplifting or theft;
- exploitation within cannabis cultivation;
- coercion to commit violent offences or intimidate others;
- financial exploitation; and
- criminal activity facilitated through online platforms.

Possible indicators of CCE include a child:

- receiving unexplained gifts, money or new possessions;
- associating with individuals known to be involved in criminal exploitation;
- experiencing changes in emotional wellbeing or behaviour;
- misusing drugs or alcohol;
- going missing from home or education or regularly returning home late;
- displaying persistent absence or poor attendance at school;
- disengaging from education;
- carrying multiple mobile phones or unexplained amounts of money; or
- becoming secretive about friendships or online activity.

Where a member of staff suspects that a child may be experiencing Child Criminal Exploitation, they will immediately report the concern to the Designated Safeguarding Lead (DSL). The DSL will assess the level of risk and initiate appropriate safeguarding procedures, including referrals to Children's Social Care, the Police and other relevant agencies where necessary.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This may be in exchange for

Love, Listen and Learn

something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, and may or may not involve violence or threats of violence.

CSE may be perpetrated by males or females, adults or children. It may occur as a one-off incident or as part of organised and repeated abuse.

A child may be sexually exploited even where the activity appears to be consensual. Children frequently do not recognise that they are being exploited and may believe they are in a genuine or loving relationship with the perpetrator.

CSE may involve both contact and non-contact abuse and can occur online or offline. Examples include:

- sexual assault or abuse;
- coercion into creating or sharing nude or semi-nude images;
- online sexual coercion or grooming;
- sexual conversations through messaging platforms;
- livestreaming sexual activity;
- exploitation through webcams or video calls;
- the sharing or distribution of sexual images without the child's knowledge; and
- exploitation involving AI-generated or digitally manipulated images.

In addition to the indicators of Child Criminal Exploitation, indicators of Child Sexual Exploitation may include a child:

- having an older boyfriend or girlfriend or an inappropriate relationship with an older individual;
- receiving unexplained gifts, money or accommodation;
- going missing from home or education;
- suffering from sexually transmitted infections;
- becoming pregnant;
- displaying changes in behaviour, emotional wellbeing or attendance; or
- showing signs of fear, coercion or controlling relationships.

Where a member of staff suspects that a child may be experiencing Child Sexual Exploitation, they will immediately report the concern to the Designated Safeguarding Lead (DSL).

The DSL will follow local safeguarding procedures, working with Children's Social Care, the Police and other partner agencies as appropriate to safeguard the child. The school will adopt a child-centred approach, recognising that children who are exploited are victims of abuse and require protection, support and appropriate intervention.

Child-on-Child Abuse

Child-on-child abuse occurs when one or more children abuse another child or children. It can occur inside and outside school, face-to-face, online or through a combination of both. The school has a zero-tolerance approach to all forms of child-on-child abuse, including sexual violence and sexual harassment. We recognise that the absence of reports does not mean that abuse is not taking place and that all children have the right to learn in a safe environment. Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children (sometimes referred to as teenage relationship abuse);
- physical abuse, including hitting, kicking, shaking, biting, hair pulling or other acts causing physical harm, including behaviour facilitated online;
- sexual violence, including rape, assault by penetration and sexual assault, whether occurring in person or facilitated online;
- sexual harassment, including sexual comments, remarks, jokes, unwanted sexual behaviour and online sexual harassment;
- causing another child to engage in sexual activity without freely given consent;
- consensual and non-consensual sharing of nude or semi-nude images or videos;
- upskirting;

Love, Listen and Learn

- initiation or hazing-type violence or rituals; and
- any other behaviour that causes harm, humiliation, intimidation or exploitation.

Online child-on-child abuse may include abusive, threatening, misogynistic or discriminatory messages, the non-consensual sharing of sexual images, coercion, online sexual harassment, image-based abuse, the sharing of pornography or harmful content, and abuse involving AI-generated or digitally manipulated images. Where concerns about child-on-child abuse arise, staff will respond immediately in accordance with Section 7 of this policy, particularly Sections 7.8 and 7.9. The school will adopt a child-centred and victim-centred approach to all reports, ensuring that children affected receive appropriate support while recognising that children displaying harmful behaviour may also have experienced abuse, trauma or exploitation and may themselves require safeguarding and support. When assessing harmful sexual behaviour, the school will take account of the children's ages, developmental stages, individual needs and the context in which the behaviour occurred.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse within their home or family environment. Domestic abuse may occur between intimate partners, family members, within teenage relationships or between children and parents or carers. Domestic abuse may be:

- physical;
- sexual;
- emotional;
- psychological;
- financial;
- controlling or coercive behaviour; or
- non-physical abuse, including witnessing the abuse of others.

Anyone can be affected by domestic abuse regardless of age, gender, ethnicity, disability, sexuality, faith or socioeconomic background. Children who see, hear or experience the effects of domestic abuse are victims in their own right. Domestic abuse can have significant and long-term effects on children's emotional wellbeing, mental health, development, behaviour and educational outcomes. Where the Police attend an incident of domestic abuse involving children, the school will respond appropriately to information received through local safeguarding notification arrangements (including Operation Encompass or any successor local scheme where applicable). The Designated Safeguarding Lead (DSL) will assess the child's needs, provide appropriate support and ensure safeguarding records are updated accordingly.

Homelessness

Being homeless or at risk of homelessness can significantly affect a child's safety, health, wellbeing and educational outcomes. The Designated Safeguarding Lead (DSL) will be familiar with local housing referral pathways and will work with the Local Housing Authority and other agencies to obtain support at the earliest opportunity, where appropriate and in accordance with local procedures. Where there are concerns that a child has suffered, or is at risk of suffering, significant harm, the DSL will make an immediate referral to Children's Social Care and work with partner agencies to safeguard the child.

So-called 'Honour-Based' Abuse (Including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) includes crimes or incidents committed to protect or defend the perceived honour of a family or community. It includes female genital mutilation (FGM), forced marriage and practices such as breast ironing. Such abuse frequently involves wider family or community pressure and may involve multiple perpetrators. All forms of so-called honour-based abuse are child abuse and will be managed in accordance with the school's safeguarding procedures. All staff will remain alert to indicators that a child may be at risk of, or have experienced, so-called honour-based abuse. Any concerns will be reported immediately to the Designated Safeguarding Lead (DSL), who will follow local safeguarding procedures and make referrals to Children's Social Care, the Police or other relevant agencies where appropriate.

Love, Listen and Learn

Staff will continue to comply with the mandatory reporting duty relating to known cases of Female Genital Mutilation (FGM) in accordance with statutory guidance.

Female Genital Mutilation (FGM)

The Designated Safeguarding Lead (DSL) will ensure that all staff receive appropriate safeguarding training to enable them to recognise children who may have experienced, or may be at risk of, Female Genital Mutilation (FGM).

Section 7.3 of this policy sets out the procedures to be followed where a member of staff discovers that an act of FGM appears to have been carried out, or where there are concerns that a child may be at risk. Possible indicators that FGM has already taken place include:

- a child disclosing that FGM has been carried out;
- a parent or family member disclosing that FGM has taken place;
- the child or family already being known to Children's Social Care because of safeguarding concerns; or
- a girl:
 - experiencing difficulty walking, sitting or standing;
 - finding it difficult to remain seated for extended periods where this was not previously an issue;
 - spending longer than usual in the toilet because of difficulties urinating;
 - experiencing recurrent urinary, menstrual or abdominal problems;
 - avoiding physical education or other physical activity;
 - having repeated or prolonged absences from school;
 - displaying increased emotional or psychological distress, including withdrawal, anxiety or depression;
 - being reluctant to undergo medical examinations;
 - asking for help without explaining the problem; or
 - talking about pain or discomfort in the genital area.

Possible indicators that a child may be at risk of FGM include:

- a family history of FGM (one of the strongest known risk indicators);
- FGM being practised within the child's family, community or country of origin;
- concerns expressed by a parent, family member or others that FGM may take place;
- the family disengaging from education, health or other professional services, or already being known to Children's Social Care; or
- a girl:
 - having a mother, sister or close female relative who has undergone FGM;
 - having limited integration into UK society;
 - referring to a forthcoming "special procedure" or "becoming a woman";
 - discussing an extended visit abroad to a country where FGM is known to be practised;
 - seeking help because she believes she is at immediate risk;
 - discussing FGM with other children, taking account of the context of the conversation;
 - becoming unexpectedly absent from school; or
 - attending travel clinics or making preparations for extended overseas travel.

These indicators are not exhaustive and should always be considered alongside the wider safeguarding context. Staff will continue to comply with the statutory mandatory reporting duty for known cases of FGM involving girls under the age of 18.

Forced Marriage

Forcing a person into marriage is a criminal offence. A forced marriage is one entered into without the free and full consent of one or both parties and where violence, threats, coercion or other forms of pressure are used to cause the marriage to take place.

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Staff will receive safeguarding training to help them recognise indicators of forced marriage and understand the importance of acting immediately. The school recognises the "**one chance rule**"—that professionals may have only one opportunity to speak to a potential victim and safeguard them effectively. Where a member of staff believes that a child may be at risk of forced marriage, they will speak to the child, where it is safe to do so, in a private and supportive environment and immediately report their concerns to the Designated Safeguarding Lead (DSL). The DSL will:

- speak with the child where appropriate and safe to do so;
- follow local safeguarding procedures and make an immediate referral to Children's Social Care and, where appropriate, the Police;
- seek advice from the Forced Marriage Unit where appropriate; and
- ensure the child receives appropriate safeguarding and pastoral support through school and partner agencies.

The school will never contact family members or community representatives to discuss concerns about forced marriage where doing so may place the child at increased risk of harm.

Preventing Radicalisation

For the purposes of this policy:

- **Radicalisation** refers to the process by which a person comes to support or legitimise terrorist violence or extremist ideologies.
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:
 - negate or destroy the fundamental rights and freedoms of others;
 - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - intentionally create a permissive environment for others to achieve either of the above.
- **Terrorism** is an action or threat of action designed to influence the Government or intimidate the public for the purpose of advancing a political, religious, racial or ideological cause, and which:
 - endangers life or creates a serious risk to public safety;
 - causes serious violence against a person or people;
 - causes serious damage to property; or
 - seriously interferes with or disrupts an electronic system.

The school recognises its duty under the **Prevent Duty** to have due regard to the need to prevent children from being drawn into terrorism. The Designated Safeguarding Lead (DSL) will undertake appropriate Prevent training and ensure that all staff receive safeguarding training appropriate to their role so they can recognise children who may be vulnerable to radicalisation. The school will regularly assess the risk of pupils being drawn into terrorism or extremist activity, taking account of local risks, local safeguarding arrangements, local authority and Police advice, and national guidance. Appropriate filtering and monitoring systems will be maintained to reduce the risk of children accessing extremist material online, alongside a broad curriculum that promotes critical thinking, digital resilience, British values and respectful debate. There is no single profile of a child who may be susceptible to radicalisation. Vulnerability may develop over time or occur rapidly. Staff will remain professionally curious and alert to changes in behaviour, presentation, relationships or online activity.

Possible indicators may include a child:

- refusing to engage with, or becoming abusive towards, those who are different from themselves;
- becoming increasingly influenced by conspiracy theories or expressing feelings of persecution;
- displaying significant changes in friendship groups, behaviour or appearance;
- withdrawing from activities previously enjoyed;
- isolating themselves from family, friends or wider support networks;
- using language that appears rehearsed or scripted;

Love, Listen and Learn

- being unwilling or unable to discuss or explain their views;
- expressing increasingly intolerant attitudes towards others;
- displaying increased anger, hostility or secrecy, particularly regarding online activity;
- expressing support for extremist ideologies or attempting to justify extremist violence;
- accessing or sharing extremist material online; or
- associating with individuals or groups known to promote extremist views.

Staff recognise that these indicators do not necessarily mean that a child is being radicalised and may reflect other safeguarding concerns or aspects of adolescent development. However, all concerns will be taken seriously and discussed promptly with the Designated Safeguarding Lead (DSL).

Where appropriate, the DSL will follow local safeguarding procedures, including seeking advice or making referrals through Prevent or Channel processes where necessary.

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment can occur:

- between children of any age or sex;
- between groups of children and individual children;
- online, offline or through a combination of both.

Sexual violence and sexual harassment exist on a continuum and may overlap.

The school recognises that all reports of sexual violence or sexual harassment must be taken seriously. Victims are likely to experience significant emotional distress, and the impact may affect their education, wellbeing and wider development. Where a child reports an incident, staff will ensure that they:

- are listened to carefully and taken seriously;
- are reassured that they have done the right thing by reporting;
- understand that they will be supported and kept safe;
- are never made to feel responsible for the abuse; and
- are never made to feel embarrassed or ashamed for making a report.

When supporting victims, the school will:

- ensure decisions remain child-centred and victim-focused;
- regularly review safeguarding decisions and adapt support where required;
- identify and respond to patterns of concerning, problematic or harmful behaviour;
- consider whether wider cultural or systemic issues within the school require action, including policy review, curriculum development or staff training;
- remain alert to the difficulties children may experience in disclosing abuse and respond with sensitivity and professional curiosity; and
- work with external agencies where appropriate to safeguard children.

The school recognises that some groups of children may be disproportionately affected, including girls, children with special educational needs and/or disabilities (SEND), and children who are lesbian, gay, bisexual or questioning. All staff understand the importance of:

- consistently challenging inappropriate behaviour;
- making clear that sexual violence and sexual harassment are never acceptable and will never be tolerated;
- reinforcing that such behaviour is not an inevitable part of growing up; and
- challenging behaviours that may constitute criminal offences, including unwanted sexual touching, grabbing, lifting clothing, pulling down clothing or other sexually motivated behaviour.

Love, Listen and Learn

Where concerns arise, or where a child makes a disclosure, staff will respond immediately in accordance with Section 7 of this policy, including the procedures set out in Sections 7.8 and 7.9. The school will work with Children's Social Care, the Police and other relevant agencies where appropriate to safeguard all children involved.

Serious Violence

All staff should be aware of the indicators, associated risks and vulnerabilities that may signal a child is at risk of, or involved in, serious violence. Possible indicators include:

- increased absence from school or persistent absence;
- changes in friendships or association with older individuals or groups;
- a significant decline in educational performance or engagement;
- signs of self-harm, emotional distress or a significant deterioration in wellbeing;
- signs of assault or unexplained injuries;
- unexplained gifts, money or new possessions, which may indicate criminal exploitation or gang association; and
- increased secrecy, carrying weapons or involvement in anti-social or criminal behaviour.

Risk factors associated with serious violence include:

- being male;
- persistent absence or previous exclusion from education;
- previous experiences of abuse, neglect or child maltreatment;
- involvement in offending behaviour, including theft, robbery or other criminal activity;
- association with gangs or criminal networks; and
- vulnerability to Child Criminal Exploitation (CCE).

Staff will remain professionally curious and alert to these indicators. Where concerns arise, they will report them immediately to the Designated Safeguarding Lead (DSL). The DSL will assess the level of risk and, where appropriate, make referrals to Children's Social Care, the Police or other relevant agencies in accordance with local safeguarding procedures.

Checking the Identity and Suitability of Visitors

The school is committed to maintaining a secure environment for all pupils, staff and visitors. All visitors will:

- report to reception on arrival;
- provide suitable photographic identification where appropriate;
- state the purpose of their visit;
- sign in using the school's visitor management system;
- wear a visitor badge at all times; and
- comply with the school's safeguarding and security procedures.

Visitors will be required to keep personal belongings, including mobile phones and other electronic devices, secure throughout their visit in accordance with school procedures. Where visitors attend for a professional purpose (for example educational psychologists, local authority officers or external professionals), the school will verify that appropriate safeguarding checks have been completed by either:

- checking photographic identification alongside evidence of an enhanced DBS check where appropriate; or
- obtaining written confirmation from the visitor's employing organisation that the appropriate safer recruitment and DBS checks have been completed.

Visitors who are not directly supervised by their employing organisation will only have unsupervised access to children where appropriate safeguarding checks have been verified. All other visitors, including contractors, volunteers, governors, parents and visiting speakers, will be supervised as appropriate throughout their visit unless

Love, Listen and Learn

the school has confirmed that unsupervised access is suitable. The school will not invite or permit any individual or organisation to use school premises where there are concerns that extremist views may be promoted or where activities are inconsistent with the school's safeguarding responsibilities and values.

Non-collection of Children

Where a child is not collected at the end of the school day or agreed collection time, the school will:

- make every reasonable effort to contact parents or carers using all available contact details;
- contact all emergency contacts held for the child where parents or carers cannot be reached;
- continue to supervise the child safely while attempts are made to establish contact; and
- where appropriate, seek advice from Children's Social Care and/or the Police if the child remains uncollected and all reasonable attempts to contact responsible adults have been unsuccessful.

All incidents of non-collection will be recorded in accordance with school procedures.

Missing Pupils

The school has procedures in place to ensure that any child who is missing during the school day is located and returned to effective supervision as quickly as possible. Where a child cannot be located, staff will immediately:

- undertake an appropriate search of the school premises and any authorised locations;
- inform the Headteacher or Designated Safeguarding Lead (DSL);
- contact the child's parents or carers where appropriate; and
- contact the Police immediately where there are concerns for the child's safety or where the child cannot be located following the school's search procedures.

All incidents involving missing pupils will be fully recorded, reviewed and, where appropriate, followed up through the school's safeguarding procedures to identify any lessons learned or further safeguarding concerns.