# St Mark's C of E Junior School

*Growing together, becoming all we are created to be*

# Child Protection and Safeguarding Policy

***(including Safer Recuitment, Allegations Against Staff & Low Level Concerns)***

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| **Governor Committee Responsible:** | **Full Governing Body** | **Staff Lead(s):** | A Fitch (DSL)<br>J Edwards / L Whale (DDSLs) |
| **Status** | **Statutory** | **Review Cycle** | **Annual (or following most recent guidance)** |
| **Designated Safeguarding Lead (DSL)**<br>**Deputy DSL**<br>**Deputy DSL** | Mrs A Fitch (head@st-marks..gloucs.sch.uk)<br>Mr J Edwards (deputy@st-marks.gloucs.sch.uk)<br>Mrs L Whale (senco@st-marks.gloucs.sch.uk) | | |
| **Chair of Governors**<br>**Governor responsible for Safeguarding** | Prof T Cooling - chair@st-marks.gloucs.sch.uk<br>Mrs K Steinhardt (Safegurading Governor) (ksteinhardt@st-marks.gloucs.sch.uk)<br>Mr B Cripps (Deputy Safegurading Governor) bcripps@st-marks.gloucs.sch.uk | **Next Review Date** | September 2027 **(or following most recent guidance)** |

**Useful Contact Details – In an emergency ring 999**

**If you have urgent safeguarding concerns for a child or young person please continue to call Multi Agency Safeguarding Hub (MASH) on 01452 426565 and select option 3. In an emergency ring 999**

**For Safeguarding concerns Professional Advice Line call MASH - 01452 427070 / 426565 and select option 2**

**Gloucestershire Safeguarding Children Partnership** Gloucestershire Safeguarding Children Partnership (GSCP) - Gloucestershire Safeguarding Children Partnership

**School Website -** https://www.stmarksjunior.com/

**Early Help Cheltenham: 01452 427070** cheltenhamearlyhelp@gloucestershire.gov.uk or alternatively 01452 426565 and select option 2

**Local Authority Designated Officer (LADO)** – amadmin@gloucestershire.gov.uk

**Channel helpline** – 020 73407264

**Staff should always be vigilant and always promptly raise concerns with their DSL or Deputy DSL**

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**FOREWORD**

**Safeguarding and promoting the welfare of children is the responsibility of EVERYONE at St Mark's C of E Junior School. Everyone who comes into contact with children and families has a role to play. In order to fulfil this responsibility effectively. We should make sure that our approach is child-centred; considering, at all times, what is in the best interests of the child.**

Everyone at St Mark's C of E Junior School fully recognises its responsibility, under section 175 of the Education Act 2002, to safeguard and promote the welfare of children; also to work together with other agencies to ensure there are adequate arrangements within our school to identify, assess and support those children who may be suffering harm.

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), the Maintained schools governance guide and Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

In accordance with KCSIE 2026, all staff, including those who do not work directly with children, must read and understand Part One of Keeping Children Safe in Education. Governors and senior leaders should read the document in full. Staff will sign to confirm they have read and understood Part One and received safeguarding induction and updates.

**This Safeguarding Policy applies to all Governors, employees (including supply and peripatetic staff), volunteers and people using the school.**

**There are three main elements to our school's safeguarding approach:**

1. **PREVENTION**

- A positive and safe school environment
- Good adult role models
- Careful and vigilant staff
- Accessible pastoral care and support to all pupils

2. **PROTECTION**

- Agreed procedures that are understood and followed
- Staff are trained and supported to respond appropriately and sensitively to safeguarding concerns

3. **SUPPORT**

- To pupils, who may have been at risk of significant harm
- An appropriate response by staff to address these concerns and to undertake any work that may be required

## SECTION.1 AIMS AND EXPECTATIONS

Safeguarding is everybody's responsibility. All staff should maintain an attitude of professional curiosity and respectful uncertainty, recognising that abuse, neglect and exploitation may be hidden. Staff should be professionally inquisitive where a child's presentation, behaviour or circumstances do not fully explain concerns.

### 1.1 AIMS

The school aims to ensure that:

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

### 1.2 EXPECTATIONS

**Staff, volunteers & Governors work together in partnership with pupils and parents to:**

- Maintain and continue to create an environment in which all children and young people feel safe, secure, valued and respected and where they can learn and fully develop.
- Establish and maintain an environment where children are encouraged to talk, and are listened to when they have a worry or concern. Ensure children know they can approach a trusted adult at St Mark's if they are worried.
- Ensure our children are equipped with the skills they need to keep themselves safe.
- Ensure all St Mark's staff members maintain a **culture of vigilance** and have an attitude of **'it could happen here'** where safeguarding is concerned and that, when issues arise about the welfare of a child, staff members always act in the interests of the child.
- Establish and maintain an environment where school staff and volunteers are encouraged to share and are listened to when they have concerns about the safety and well-being of a child.
- Ensure that all staff know the procedures for reporting a concern or making a child protection referral and that staff are well equipped to spot signs of abuse or a child in need of early help for a variety of reasons.
- Ensure that all staff are prepared to identify children who may benefit from early help.
- Ensure that any children who have been abused will be supported in line with a child protection plan, where deemed necessary.
- Include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse or from other areas of risk as part of a broad and balanced curriculum.
- Actively contribute to the Spiritual, Moral, Social and Cultural (SMSC) development of children as well as other key aspects of a young person's well-being and mental health (being healthy, staying safe, enjoying and achieving, making a positive contribution and achieving economic well-being).

- Ensure that we have suitable staff by adhering stringently to safer recruitment processes and ensuring any unsuitable behaviour is reported and managed quickly using the Allegations Management procedures.

**SECTION.2: LEGISLATION AND STATUTORY GUIDANCE**

This policy is based on the Department for Education's (DfE's) statutory Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), the Maintained Schools Governance Guide and Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

- 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') and Childcare Act 2006, which set out who is disqualified from working with children
- The Children's Wellbeing and Schools Act 2026, including the statutory Information Sharing Duty, which places a legal expectation on relevant organisations to share information that is relevant to safeguarding and promoting the welfare of children. Staff should be confident to share information lawfully, proportionately and in a timely manner where this supports a child's welfare or safety.
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**This policy should be read in conjunction with:**

- Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026)
- the school Behaviour and Character Development policy;
- the staff behaviour policy known at St Mark's as the Staff Code of Conduct;
- the safeguarding response to children who go missing from education;
- specific guidance about the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

The child protection policy induction pack includes all relevant documentation and guidance and is updated on an annual basis to reflect both regional and national changes. Electronic copies can be found on the school server under the 'Safeguarding' section.

**SECTION.3 DEFINITIONS**

**Safeguarding** is what we do for all children and **Child Protection** is what we do for children who have been harmed or are at significant risk of being harmed.

**What is meant by 'Safeguarding'?**

Safeguarding and promoting the welfare of children is defined as:

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

*children includes everyone under the age of 18

**What is meant by 'Child protection'?**

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

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

**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.

**Children** includes everyone under the age of 18.

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

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

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

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

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

## SECTION 4: EQUALITY STATEMENT

St Mark's is committed to anti-discriminatory and anti-racist safeguarding practice. Staff will recognise the impact that discrimination, racism, prejudice and inequality may have on children's experiences and access to support. Safeguarding responses will be culturally sensitive, equitable and child-centred.

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or heakth conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

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

**Children potentially at greater risk of harm** may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. We fully recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

**SECTION.5: ROLES AND RESPONSIBILITIES**

Safeguarding is everybody's responsibility. All staff should maintain an attitude of professional curiosity and respectful uncertainty, recognising that abuse, neglect and exploitation may be hidden. Staff should be professionally inquisitive where a child's presentation, behaviour or circumstances do not fully explain concerns.

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

- Behaviour and Character Development policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 5.1 All staff

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

All staff will:

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

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct], the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, the Online Safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring and the safeguarding response to children who go missing from education
- The Family Help and Early Help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The Information Sharing Duty and the expectation that concerns relating to a child's welfare, safety or emerging needs should be shared promptly with the DSL. Staff should understand that information sharing is a safeguarding responsibility and should not be delayed by uncertainty regarding consent where lawful information sharing is necessary to protect or promote a child's welfare.

- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questining (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

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

### 5.2 Designated Safeguarding Lead (DSL)

**At St Mark's, the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) is a senior member of staff from the school leadership team.** Current DSL and DDSL responsibilities at St Mark's:

**DSL (Designated Safeguarding Lead)** and designated teacher for CIC (Children in Care), CSE (Child Sexual Exploitation) and PREVENT duty is:

**Mrs Angharad Fitch (Headteacher)** head@st-marks.gloucs.sch.uk **Tel: 01242 702280**

**Deputy DSL is: Mr John Edwards (Deputy Headteacher)** deputy@st-marks.gloucs.sch.uk

**Deputy DSL is: Mrs Liz Whale (SENCO & Senior Leader)** senco@st-marks.gloucs.sch.uk

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

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

The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

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

The DSL, Deputy DSLs will always be available for school stakeholders (both in person, telephone or through email) in the school to discuss any safeguarding concerns. To strengthen this, there are two deputies to provide safeguarding cover at all times e.g. the DSL may be on planned time away from the school for training etc. and the deputy off sick which could lead to unacceptable delay in protecting a child. In the absence of the DSL, all staff will be aware of which deputy DSL is available.

### 5.3 Governors

St Mark's has a Nominated Safeguarding Governor who takes the lead responsibility for the Governing Body and works closely with the Designated Safeguarding Lead and Chair of Governors on safeguarding issues.

The responsibilities of the Governing body in relation to safeguarding are outlined in KCSIE 2026 and Ofsted Inspecting safeguarding in early years, education and skills settings.

**The nominated governor for safeguarding & child protection including CSE, Prevent Duty and Children in Care at St Mark's is: Mrs Katy Steinhardt ksteinhardt@st-marks.gloucs.sch.uk Our Deputy Safeguarding Governor is: Mr Brian Cripps bcripps@st-marks.gloucs.sch.uk**

**The responsibilities placed on the governing body include:**

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 process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Ensure that the Governing Body will ensure that child protection type concerns or allegations against adults working in the school are referred to the Local Authority Designated Officer, supported by the Allegations Management Co-Ordinators. Contacts: 01452 426994 / nigel.hatten@gloucestershire.gov.uk or 01452 426320.
- Ensuring that the name of the designated members of staff for Child Protection, the DSL Officer, will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

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

Section 15 of this policy has information on how governors are supported to fulfil their role.

### 5.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable

### 5.5 Virtual school heads

- Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.
- They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

### 5.6 Pupils

At St Mark's, it is crucial that all pupils are protected and helped to keep themselves safe. To this end:

- All pupils have the right to be protected from abuse and neglect
- All pupils should be confident that they are listened to at all times in relation to safeguarding concerns both relating to themselves or to other children and that these concerns will be acted upon
- All pupils in the school are aware of staff who they can talk to. The names of the DSL/DDSL & Safeguarding Governor are available throughout the school in the form of posters.
- Pupils who are being abused, neglected or at risk of harm will be confident to tell people they trust and with whom they feel safe
- All pupils should be confident that they are protected and helped to keep themselves safe from bullying, homophobic behaviour, racism, sexism and other forms of discrimination
- All pupils are taught, at an age-appropriate level, key aspects of safeguarding through PSHE (HeartSmart & Gloucestershire's PinK Curriculum) as a preventative measure e.g. child sexual exploitation at an age appropriate level, the importance of keeping safe through the NSPCC PANTS programme and on line resources such as Childline and ThinkUKnow to develop their understanding of e-safety as well as visits and lessons from PCSOs (Schoolbeat). As a result of this training, children will be confident to keep themselves safe
- All children play their part in ensuring that behaviour is positive and consistent at all times

### 5.7 Parents, Carers and Guardians

The school shares a purpose with parents to educate, keep children safe from harm and have their children's welfare promoted.

- Everyone at St Mark's is committed to working with parents/carers/guardians positively, openly and honestly
- We ensure that all parents/carers/guardians are treated with respect, dignity and courtesy

- We respect parents/carers/guardians' rights to privacy and confidentiality and will not share sensitive information until we have permission or it is necessary to do so to protect a child
- We will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm
- We encourage parents/carers/guardians to disclose any concerns they may have
- We make parents/carers/guardians aware of our Safeguarding and Child Protection Policies and parents are aware that these are on the school website
- There is a commitment to work in partnership with parents/carers/guardians and in most situations it may be appropriate to discuss initial concerns with them. It should be recognised that there are circumstances however, where it would be inappropriate to discuss concerns with parents/carers/guardians and may in fact put the child at greater risk. This may include identification of sexual abuse, physical abuse cases where a parent/carer/guardian may be responsible for the abuse and parents who may not be able to respond reasonably to the situation.

### 5.8 Others (including supply teachers)

- Visitors with a professional role, such as the school nurse, social worker, educational psychologist or members of the Police will have been vetted to work with children through their own organisation
- All other professionals will be required to bring their identity badges on all visits and to wear these. They will complete signing in/out forms and wear a school I.D. badge if required to do so
- Agency, third-party staff and contractors, will understand that the guidance in KCSIE will be followed at all times
- All visitors will be issued with a School Visitor Safeguarding Guide leaflet and asked to read it before singing in as confirmation that the information has been read and understood.

## SECTION.6: CONFIDENTIALITY

Please see Section 11 for a full exaplantion of the school's approach to condfidnetiality and data protection with respect to safeguarding. At St Mark's, we know that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

## SECTION 7: RECOGNISING ABUSE AND TAKING ACTION

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

*In this and subsequent sections, any references to the DSL also mean "the DSL (or deputy DSL)".*

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

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

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

**Types of abuse**

Through training, all staff need to be able to identify signs of abuse or neglect and be able to identify cases of children who may be in need of help or protection

**The school has a responsibility to work with other agencies on all safeguarding issues (both current and possible in the future) which may include:**

- **Physical, Emotional and Sexual Abuse**
- **Neglect**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and consensual and con-consensual sharing of nudes and semi nudes images and / or videos can be signs that the children are at risk. Other safeguarding issues all staff should be aware of include (refer to Part 1 of KCSiE 2026):

- Child Sexual Exploitation (CSE)

- Child Criminal Exploitation (CCE)
- Female Genital Mutilations (FGM)
- Mental Health
- Child on Child abuse
- Serious Violence

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

Actions need to be prompt - Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral. See Referral process diagrams below for further information as to how this can be done.** Tell the DSL as soon as possible if you make a referral directly.

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

- Where possible, speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the DDSL or a member of the Senior Leadership Team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate.
- Share any action taken with the DSL as soon as possible.
- The school will discuss and agree, with statutory safeguarding partners, levels for different types of assessment, as part of local arrangements

### 7.2 If a child makes a disclosure to you

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

- Reassure victim(s) that they are being taken seriously and that they will be supported and kept safe (a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report)
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Add this record to the school's electronic system CPOMS so that it can be securely shared with key staff. Alternatively, if appropriate, make a

referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Again, add this record to CPOMS.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

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

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

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

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

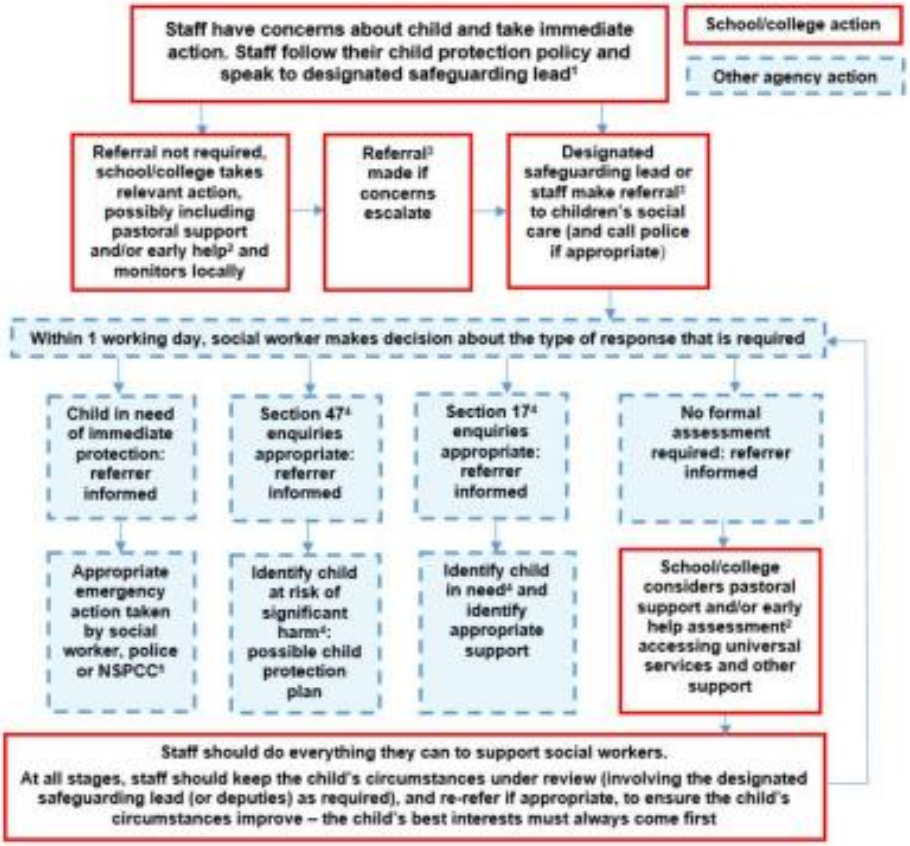
The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

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

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

## Actions where there are concerns about a child




[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

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

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

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

**Early help assessment**

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

**Referral**

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

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

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

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

Child abuse can also be reported to Gloucestershire Local Authority directly via this link: https://www.gov.uk/report-child-abuse-to-local-council

### 7.6 If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

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

### 7.7 If you have a concern about mental health

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

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

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

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

Reference can be made to the Department for Education guidance on mental health and behaviour in schools for more information.

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

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Where concerned about the welfare of a child, staff should always act in thr best interest of the child. The flow chart below sets out the process for staff when they hae concerns about a child.

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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

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

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

### 7.8 Allegations of abuse made against other pupils (known as Child on Child Abuse)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

All child-on-child abuse is unacceptable and will be taken seriously.

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

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

See appendix 4 for more information about child-on-child abuse.

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

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

**7.11 What is Child on Child abuse most likely to include?**

Staff recognise that child on child abuse is most likely to include, but may not be limited to:

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

**7.12 How will victims, perpetrators and any other children affected by child on child abuse be supported?**

- The relevant staff will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report
- The relevant staff will consider the age and the developmental stage of the alleged perpetrator(s) and nature and frequency of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- The relevant staff will need to consider the proportionality of the response

- If the incident is significant, external agencies will be used to offer specific support for the victim e.g. NHS; NSPCC; Childline
- The school should maintain arrangements to protect and support the victim for a long time. The school should be prepared for this and should work with children's social care and other agencies as required.
- It is important that the school do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- The school will need to safeguard the victim (and all other children, adult students and staff and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- The school will work with professionals as required to understand why a child may have abused a peer. It is important to remember that, as a child, any alleged perpetrator(s) is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.
- It is important that the perpetrator(s) is also given the correct support to try to stop them reoffending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportional in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. The school should carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, children's social care and/or the police will have a very clear view and it will be important for the school or college to work with relevant agencies to ensure a consistent approach is taken to information sharing.
- The school will meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.
- It is also good practice for the school or college to meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.
- The school will support other pupils who may have been affected by the incident.
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

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

### 7.13 Sharing of nudes and semi nudes ('sexting')

The school will refer to the suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

**Your responsibilities when responding to an incident:**

If staff are made aware of an incident involving the sharing of nudes and semi nudes images and/or videos, you must report it to the DSL immediately

You must not:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

**Initial review meeting**

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

**Further review by the DSL**

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

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

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

**Informing parents/carers**

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

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the Community / School Beat Officers in the first instance or through dialling 101.

**Recording incidents**

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

**Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education / relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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

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

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

**7.14 Extra-familial harm**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered on one definition of one label alone. In most cases, multiple issues will overlap with one another.

**Staff should always be vigilant and always raise concerns with their DSL or DDSL**

## SECTION 8. ONLINE SAFETY AND MOBILE TECHNOLOGY

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

To address this, our school aims to:

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

### The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems and the use of AI to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. (Filtering and monitoring requirements also apply to use of generative AI – see section 8.2 below)
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- Senior leaders and governors will receive assurance reports regarding the effectiveness of filtering and monitoring systems and ensure arrangements remain proportionate, effective and responsive to emerging safeguarding risks, including risks associated with generative artificial intelligence.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

**8.1 Safeguarding & Emotional Health and Wellbeing within the curriculum**

Through PSHE and other curriculum contexts such as Relationships and Sex Education (RSE), children at St Mark's are encouraged to talk about their feelings to deal assertively with pressures that they may face. The statutory guidance can be found here: Statutory guidance: relationships education relationships

and sex education (RSE) and health education.

Every opportunity is taken to teach children about safeguarding such as child sexual exploitation, healthy relationships, hate, Domestic Abuse and bullying, and forced marriage.

Children are listened to and provided with age-appropriate advice and guidance. They also know who they can turn to if they need help.

Key staff have undertaken Mental Health First Aid training and the school is aware of and makes full use of the outcomes from the on-line pupil survey.

The use of the PinK Curriculum and HeartSmart supports the delivery of this aspect of the curriculum.

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### 8.2 Artificial intelligence (AI)

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

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

St Mark's will treat any use of AI to access harmful content or bully pupils in line with this policy and our online safety policy.

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

### 8.3 Filters and Monitoring

At St Mark's, we ensure that appropriate filters and appropriate monitoring systems are in place through the use of the SWGfL Networks. The Governing Board recognises that whilst it is essential that appropriate filters and monitoring systems are in place, they are careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

The school community also recognises that the use of technology has become a significant component of many safeguarding issues. Child Sexual Exploitation; Radicalisation; Sexual Predation; technology often provides the platform that facilitates harm.

We believe that an effective approach to online safety empowers our school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and deal appropriately with any incident where appropriate. This is achieved through specific websites being identified on the main school website and the use of professionals to lead e-safety events for parents.

Whilst filtering and monitoring are an important part of the online safety picture for our school, it is only one part of a whole school approach to online safety. Further information can be found in the 'Acceptable Use' policy.

## SECTION 9: REPORTING AND RECORDING FOR CHILDREN

### 9.1 What systems are in place for children to confidently report abuse, knowing their concerns will be treated seriously?

- fostering an open and honest environment for pupils without prejudice.
- ensuring that the pupils in our care have a voice. Our pupil voice groups encourage all children to follow our 'FACE' values. By doing this, we feel that a positive ethos in school will be created and a culture where all children understand the boundaries of behaviour before it becomes abusive.
- ensuring that we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them.
- ensuring that children can report abuse with the confidence that their concerns will be treated seriously.
- signposting to young people in the event that they don't feel confident raising an issue to staff or a peer for example Childline posters are displayed around school and the school makes use of the NSPCC for pupil workshops.
- ensuring that the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people, including use of inappropriate language and behaviour towards one another.
- focusing upon whole staff training and CPD around abusive behaviours
- ensuring that we have a strong and positive PHSE/SMSC curriculum that tackles such issues as prejudiced behaviour and which gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.
- ensuring that the systems in place are well promoted, easily understood and easily accessible for children

### 9.2 How will allegations be investigated and recorded?

It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.

- Reassure the child that they are being taken seriously
- Be supportive and respectful of the child
- If the report includes the sharing of nudes or semi-nudes, staff should not view or forward illegal images of the child (see section on previous page)
- Do not promise confidentiality
- Listen carefully, reflecting back, using the child's language, being non-judgemental, being clear about boundaries, not asking leading questions and only prompting with open questions – where, when , what etc…

- It is essential that a written record is made
- Only record the facts as the child presents them (it should not reflect the personal opinion of the note taker)
- Inform the DSL (or deputy), as soon as practically possible

**SECTION 10: RECORDING, SHARING INFORMATION & CONFIDENTIALITY**

**The child's wishes -** Where there is a safeguarding concern, those involved should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views. Ultimately, all systems and processes should operate with the best interests of the child at their heart.

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

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

Our school will therefore support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children and offering Early Help.
- Notifying Social Care as soon as there is a significant concern.

Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority

**10.1 Record Keeping (CPOMS alerts should be checked and read on a daily basis)**

All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded on the school electronic system, CPOMS. Class teachers must be tagged in at all rtimes to ensure they are aware of concerns. Information is kept confidential and stored securely.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;

- action taken, decisions reached and the outcome.

In line with the Information Sharing Duty, Safeguarding records must clearly identify:

- why information was shared or not shared;
- who information was shared with;
- the lawful basis for sharing where relevant;
- any response received from external agencies;
- any follow-up actions.

Staff should ensure recordings distinguish clearly between facts, observations and professional opinion.

If there is any doubt about what should be recorded, staff should discuss it with the DSL (or DDSL).

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

**10.2 Information sharing Duty and Confidentiality (Children's Wellbeing and Schools Act 2026)**

St Mark's C of E Junior School recognises that effective information sharing is central to safeguarding and promoting the welfare of children.

Under the Information Sharing Duty, relevant organisations are expected to share information that is relevant to safeguarding and promoting the welfare of children. This includes concerns relating to:

- emerging needs;
- welfare concerns;
- cumulative risk;
- early help requirements;
- child protection concerns.

Staff must not wait until concerns meet child protection thresholds before sharing relevant information with the Designated Safeguarding Lead (DSL). Early sharing of concerns may help prevent harm and ensure children receive support at the earliest opportunity.

At St Mark's, all staff recognise that information sharing is vital in identifying and tackling all forms of abuse and neglect. The school and staff will be proactive in sharing information as early as possible (under the Information Sharing Suty) to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

As part of this duty, the school is fully aware that the Information Sharing Duty, Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

**However, the school and staff also recognise that The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.**

Relevant staff have received training to ensure that they have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR.

Staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent. If it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about information sharing.

**Principles of Good Information Sharing**

When sharing information, staff will ensure that information is:

- Relevant to the safeguarding or welfare concern;
- Necessary to support decision-making and intervention;
- Accurate and based on evidence;
- Distinguishable between fact, observation and professional opinion;
- Shared only with those who need to know;
- Proportionate to the concern identified;
- Recorded appropriately on CPOMS, including rationale for decisions made.

**Consent and Transparency**

St Mark's recognises the distinction between:

- Consent to share information; and
- Consent to receive services or support.

The school acknowledges that parental consent is not always required before safeguarding information can be shared. Information may be shared lawfully where it is necessary for safeguarding and promoting the welfare of a child.

Wherever appropriate and safe to do so, the school will be transparent with children, parents and carers regarding information sharing decisions. Transparency should not be confused with seeking consent where consent is not legally required.

**10.3 Informing Parents/Carers/Guardians**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

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

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

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

**10.4 Pupils with special educational needs, disabilities or health issues**

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

**10.5 Pupils with Child Protection Plans**

Pupils who are the subject of a Child Protection Conference will have either an agreed multi-disciplinary action plan or child protection plan. The Designated Safeguarding Lead or a member of the safeguarding

team will attend planning meetings and core group meetings specified in the plan and contribute to assessments and plans.

The School recognises that pupils who are the subjects of abuse, neglect or who live in situations of domestic violence may exhibit distressed or challenging behaviour and may not be reaching their full academic potential. The school will ensure that appropriate support mechanisms are put in place to support pupils in school.

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

**10.6 Pupils with a social worker**

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

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

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

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

**10.7 Looked-after and previously looked-after children**

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Liz Whale (SENCO) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

**10.8 Pupils who are lesbian, gay, bisexual or gender questioning**

The school will continue to follow current DfE guidance and KCSIE 2026 in relation to children who are lesbian, gay, bisexual or gender questioning, ensuring safeguarding decisions are child-centred, evidence-informed and made in partnership with parents and relevant professionals where appropriate.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy and anti bullying policy for more detail on how we prevent bullying based on gender or sexuality.

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

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

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

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

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

**SECTION 11 - MULTI-AGENCY WORKING**

• Everyone at St Mark's is committed to developing effective partnership working with relevant agencies in the best interest of children and young people. Effective multi-agency working and communication helps to safeguard young people. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

• The GSCP (Gloucestershire Safeguarding Children's Executive) website sets out all of the child protection referral processes Multi-Agency Safeguarding Hub (MASH) & Community Social Work Team - Gloucestershire Safeguarding Children Partnership

**11.1 Gloucestershire Encompass Commitment**

As part of St Mark's C of E Junior School's commitment to keeping children safe, we have signed up to implement the principles and aims of the Gloucestershire Encompass Model.

Operation Encompass aims to support children and young people who are affected by domestic abuse. Witnessing or experiencing domestic abuse is really distressing for a child or young person, who often see the abuse, hear it from another room, see a parent's injuries or distress afterwards, or can be physically hurt by trying to stop the abuse.

As a result, following any domestic abuse incident being reported to the police, the Police will make contact with one of the Education Researchers within the Gloucestershire MASH, who will then on behalf of the police communicate relevant, necessary and proportionate information to nominated school staff. This will ensure that the school is made aware at the earliest possible opportunity and can subsequently provide support to children in a way that means they feel safe and listened to.

Each school has members of staff who have been fully trained in liaising with police and Children's Social Care when required, and will ensure that the necessary support is made available to the child or young person following the notification of a domestic abuse incident.

In signing up to Gloucestershire Encompass the Governing Body and Senior Leadership Team:

• Endorse the Gloucestershire Encompass Model and support the Key Adults in our school to fulfil the requirements of the Gloucestershire Encompass Protocol

• Promote and implement Gloucestershire Encompass processes and use these in accordance with internal safeguarding children processes

• Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection.

**11.2 Off Site Visits**

Off site visits will be the subject of a risk assessment. Safeguarding concerns or allegations will be responded to following the allegations management procedures as outlined within this policy. The member of staff in charge of the visit will report any safeguarding concerns to the Designated Safeguarding Lead, who will pass the concern to Social Care if appropriate. In an emergency, the staff member in charge will contact the police and/or social care.

The child protection/safeguarding policy and procedures of an off-site provider e.g. water sport activity, will be checked and the DSL satisfied that they are appropriate, before using the facility.

**11.3 Transport**

A risk assessment is in place for all transport movements. If transport is required for a school trip permission is obtained from parents. The transport is through transport companies that are endorsed by GCC. Consideration is also given to the use of booster / car seats to meet UK legislation.

**11.4 Information and support**

There is a wealth of information available to support schools and colleges to keep children safe online. The following is not exhaustive but should provide a useful starting point:

NSPCC Sexting Advice NSPCC Child Sexual Exploitation Advice

www.thinkuknow.co.uk www.disrespectnobody.co.uk www.saferinternet.org.uk

www.internetmatters.org www.pshe-association.org.uk

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

**SECTION 12: OUR OFFER OF EARLY HELP (Family Help)**

**(Please refer to the school website for further details)**

Everyone needs help at some time in their lives and therefore an ethos of early help is important for any school. We believe that early interventions for children or their families are more effective in promoting the welfare of children than reacting later. It means providing support as soon as a problem emerges.

The school recognises the development of Family Help arrangements as described within Working Together to Safeguard Children 2026. Where appropriate, school staff will contribute to Family Help assessments and plans and work collaboratively with partner agencies to secure coordinated support for children and families.

In line with the Information Sharing Duty, staff should proactively share concerns relating to emerging needs and vulnerabilities with the DSL. The school recognises that early information sharing is often essential in securing Early Help interventions and preventing concerns from escalating into child protection matters.

At St Mark's, we recognise that any child may benefit from Early Help, but insist that staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- has a family member in prison

Schools such as ours are best placed to provide up-to-date guidance support and intervention on specific safeguarding issues when and if they arise. We will refer to appropriate agencies when help is required to support children, young people or families or to prevent harm. Families themselves should also feel empowered to make contact with the relevant professionals or agencies should they need help and support.

Our aim at St Mark's is to help pupils and families as early as possible when issues arise: 'offering the right help at the right time to stop any issues getting worse'. Early Help is an approach not necessarily an action. It includes prevention education as well as intervention where necessary or appropriate. In some cases immediate urgent action might be necessary if a child or young person is at risk of immediate harm.

**All staff at St Mark's are aware of the Offer of Early Help. At all times all staff are asked to consider if there is any Offer of Early Help that we can make in order to help a child thrive.**
**Parents/carers/guardians will also benefit from having the Offer of Early Help information so that they can make decisions about where to go for professional help or support or where to ask questions when any need arises for their family. This applies not only to the children in our care at St mark's but extends to families who may have concerns about older siblings.**

It should be noted that our early help support will be kept under constant review and consideration will be given to referral to Children's Social Care if the child's situation does not appear to be improving. In order to do this, the school will work with other local agencies to identify children and families who would benefit from early help.

To this end, school staff with designated responsibility for providing early help will:

- Undertake an assessment of the need for Early Help
- Make use of the graduated pathway for early help and service provided by the relevant Early Help Partnership
- Provide early help services e.g. School Nurse, SENCO, Family Outreach Worker etc
- Refer to appropriate services e.g. CYPS, Family Information Service
- Ensure that pupils have a choice of staff available to them to listen to their concerns or needs, for example, emotional health needs

All staff will be supported in the following ways:

- Access to relevant training with a focus on how early help can support pupils
- Access to an up-to-date register of early help
- Access to GSCB website – Levels of Intervention (see end of this policy)
- Support from senior members of staff with specific training in emotional health and well-being

**If anyone thinks a child or young person is at immediate risk of significant harm they should always call 999. Anyone can do this. In the case of needing medical help fast dial 111.**

**SECTION 13: Complaints and concerns about school safeguarding policies**

### 13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### 13.2 Other complaints

Other safeguarding-related complaints– for example, those related to pupils or premises will be directly reported to the DSL or DDSL and will be handled in accordance with GCC advice.

### 13.3 Whistleblowing

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

Whistle-blowing about the Headteacher should be made to the Chair of the Governing Body, whose contact details are readily available to staff in the school office.

If staff members have concerns about another staff member, then this should be referred to the Headteacher.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Leadership Team. Appropriate whistleblowing procedures are suitably reflected in the safeguarding induction pack and staff code of conduct policy to enable this to happen.

Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

The **NSPCC whistleblowing helpline** is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: **help@nspcc.org.uk**

**See the school's full Whistleblowing policy for more information**

## SECTION 14: TRAINING

### 14.1 All staff

All new staff will receive safeguarding induction, including KCSIE Part One, staff code of conduct, behaviour policy, whistleblowing procedures, online safety, filtering and monitoring expectations and local safeguarding arrangements before working unsupervised with children. Annual safeguarding updates will include national and local safeguarding developments, including emerging online harms and AI-related risks

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Information Sharing Duty requirements:
  - consent versus transparency;
  - information-sharing case studies;
  - relevance and proportionality;
  - recording and evidencing information-sharing decisions;
  - unconscious bias and anti-discriminatory safeguarding practice.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

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

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

Volunteers will receive appropriate training, if applicable.

**14.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

**14.3 Governors**

The Governing Body will seek assurance that all staff have read and understood Part One of KCSIE 2026 and that safeguarding training records are maintained and monitored. Governors will receive regular updates regarding safeguarding trends, attendance, vulnerable pupils, filtering and monitoring, low-level concerns and safer recruitment compliance.

This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

**14.4 Recruitment – interview panels**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

**SECTION 15: MONITORING ARRANGEMENTS**

Our Safeguarding & Child Protection Policy and Procedures will be monitored and evaluated by the Headteacher/DSL and Safeguarding Governor on a termly basis to ensure that it is understood and being operated effectively in practice. The policy will be full reviewed **annually** by DSL and deputies. At every review, it will be approved by the full governing board.

To support this monitoring, the following sources of information will be used:

- Designated Safeguarding Governor visits to the school
- Scrutiny of Single Central Record (SCR)
- Leadership Team 'drop ins' and discussions with children and staff
- Completion of the GSCB annual Section 175 audit
- Pupil surveys and questionnaires, including the Gloucestershire on-line pupil survey (OPS)
- Scrutiny of Attendance data
- Scrutiny of a range of risk assessments
- Scrutiny of GB minutes
- Scrutiny by the school leadership team and Governing Body of bullying/racist/behaviour incidents/referrals on a termly basis
- Review of parental concerns, complaints, Parent Forum and parent questionnaires
- Review of training undertaken by all staff and volunteers
- Information and updates from GSCE training events / DSL forum
- The implementation of the Information Sharing Duty:
  - timeliness of referrals;
  - quality of safeguarding records;
  - evidence of early information sharing;
  - outcomes from referrals and partner agency feedback;
  - consideration of equality and disproportionality in safeguarding decisions.

**SECTION 16 – LINKS TO OTHER POLICIES & ADDITIONAL INFORMATION**

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Whistle blowing
- Acceptable Use
- Anti bullying
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices

**Links**

Gloucestershire Safeguarding Children Partnership (GSCP) - Gloucestershire Safeguarding Children Partnership

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

https://www.nspcc.org.uk/

https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

https://www.gov.uk/guidance/teaching-about-mental-wellbeing

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

## Appendix 1: types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

# Safer recruitment policy

### Recruitment and selection process

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

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

**Advertising**

When advertising roles, we will make clear:

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

**Application forms**

Our application forms will:

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

**Shortlisting**

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

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

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

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

- Any relevant overseas information
- If they are known to the policy and children's local authority social care and
- If they have been disqualified from providing childcare

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

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

**Seeking references and checking employment history**

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

When seeking references we will:

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

**Interview and selection**

When interviewing candidates, we will:

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

### Pre-appointment vetting checks

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

**New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

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

**Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

**Agency and third-party staff**

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

**Contractors**

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

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

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

**Trainee/student teachers**

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

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

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

**Volunteers**

We will:

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

**Governors**

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

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

**Staff working in alternative provision settings**

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

**Adults who supervise pupils on work experience**

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

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

**Pupils staying with host families**

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

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

# Allegations against staff (including low-level concerns) policy

### Section 1: allegations that may meet the harm threshold

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

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

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

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

### Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

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

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

### Definitions for outcomes of allegation investigations

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

### Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support is available through Occupational Health and / or through the Emplyee Assistance Programme
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

**Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### Specific actions

**Action following a criminal investigation or prosecution**

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

**Conclusion of a case where the allegation is substantiated**

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

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

**Individuals returning to work after suspension**

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

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

**Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

**Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

### Confidentiality and information sharing

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

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

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

### Record-keeping

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

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

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

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

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

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

### References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

### Learning lessons

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

This will include consideration of (as applicable):

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

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

### Non-recent allegations

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

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

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

### Section 2: concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school

- Pre-employment vetting checks

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

### Definition of low-level concerns

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

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

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

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

### Sharing low-level concerns

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

We will create this culture by:

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

### Responding to low-level concerns

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

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

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

Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children

### Record keeping

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

Records will be:

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

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

### References

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

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

## Appendix 4: specific safeguarding issues

### Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

**Sexually motivated incidents**

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

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

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

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

**Financially motivated incidents**

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

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

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

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

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### Children who are absent from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care

- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

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

### Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

### Child sexual exploitation

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

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

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

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

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

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

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

### Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

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

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

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass

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

### Homelessness

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

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

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

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

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

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

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

**FGM**

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

**Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

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

## Preventing radicalisation

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

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

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

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

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

### Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

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

### Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

### Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Attempt to phone the first and second contacts recorded on our school database
- Attempt to phone all other recorded contacts for that pupil
- Leave voicemails providing details of the need for the pupil to be collected
- Send texts and emails where relevant contact details are held on our school database requesting their child iscollected
- Keep the child safe with a member of SLT and, if no contact has been made from the family providing clarity of when collection will happen by 5pm, make contact with children's social care to collaborate on next steps.
- Record chronology of steps taken on CPOMS

### Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon aspossible. If a child goes missing, we will:

- Deploy staff across the school site with walkie-talkies to establish open lines of communication
- Visit known 'hiding spots'
- Sustain the search until such a moment as it is clear that the child can no longer be on the premises and therefore musthave escaped the premises
- Inform the child's parents/carers by phone once the child has been found, are safe and are regulated with trusted adults.
- Complete a full investigation and restoration around the circumstances leading to the child going missing
- Update / create risk assessments for this child

In the event of a child escaping from the school premises, the police will be phoned followed immediately by the child's parents/carers.

## Appendix 5 – Designated Safeguarding Lead & Deputy Designated Safeguarding Lead Job Description

The Designated Safeguarding Lead (DSL) has a legal responsibility for dealing with safeguarding issues, providingadvice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Leads are senior members of staff.

**The DSL will have:**

- The appropriate authority within the school to carry out the duties of the post
- The role explicitly set out in

their job description

-

The Deputy DSL(s) will

- Be trained to the same standard as the DSL
- Have the role explicitly set out in

their job description

- Areas of responsibility:

**Policy and procedure:**

- Act as a champion of the school's safeguarding policy and procedures by ensuring all staff have access to andunderstand them
- Induct new members of staff with regard to the school and Local Authority safeguarding policies andprocedures
- Ensure the school safeguarding policy is updated and reviewed annually
- Ensure parents see copies of the safeguarding policy to avoid potential conflict later
- Ensure that all staff are aware of their responsibility to challenge behaviour which breaches the Guidance forSafer Working Practice (Code of Conduct)
- Ensure that the online safety of pupils is paramount and have relevant and up to date training.

**Reporting concerns:**

- Recognise how to identify signs of abuse and when to make a referral
- Respond appropriately to disclosures or concerns relating to the well-being of a child
- Refer allegations or cases of suspected abuse to the relevant investigating agencies, ensuring they have
- access to the most relevant up to date information
- Ensure that relevant, detailed and accurate written records of referrals/concerns are on the school's
  safeguarding central management system
- When pupils move school, ensure their safeguarding file is sent to the new establishment immediately andsecurely alongside a verbal DSL handover

**Multi Agency working:**

- Ensure that pupils who are victims of abuse are supported appropriately and sensitively and that all actionsfrom planning and intervention meetings are carried

out and monitored
- Attend and contribute effectively to Child In Need meetings, Child Protection conferences, planning andreview meetings; including those taking place out of normal working hours.
- Liaise and coordinate with colleagues and outside organisations to provide Early Help as soon as a problem emerges, at any point in a child or young person's life working with the Early Help Strategic Partnerships andreferring to the Early Help Allocation groups where necessary. Acting as Lead Professional as appropriate
- Ensure that actions resulting from meetings are SMART and that they are carried out in a co-ordinated way;making the difference which was anticipated

**Training:**
- Ensure all staff have safeguarding induction within their first 10 working days and receive frequent updatesso that they are able to recognise and report any concerns immediately
- Attend relevant training every 2 years and an annual basis attend forums/roadshows to reinforce andenhance Safeguarding knowledge and practice
- Represent the school at Designated Lead forums and disseminate the information to colleagues

**Knowledge and skills:**
- Act as a source of support, advice and expertise within the school
- Have a working knowledge of how the Gloucestershire Safeguarding Partnership operates
- Ensure that staff members are following up to date procedures in line with National and Local expectations
- Act with integrity; maintaining confidentiality at all times

**General Duties:**
- To undertake such other duties, training and/or hours of work as may be reasonably required and which areconsistent with the general level of responsibility of this job.
- To ensure that the Keeping Children Safe in Education Assurance Declaration from the Gloucestershire Safeguarding Children Partnership (GSCP) is completed annually and returned by deadline and reviewedregularly, informing the school's safeguarding best practice.

## Appendix 6 – Information Sharing Decision Making Framework

**Decision Making Framework (Visible on Staffroom Safegurading Notoceboard)**

✅ **If in doubt, speak to the DSL.**

✅ Share concerns early. Do not wait for significant harm to occur.

✅ Consent is **not always required** for safeguarding information sharing.

✅ Share only information that is:

- Relevant
- Necessary
- Accurate
- Proportionate

✅ Record factual information and avoid assumptions.

✅ Always consider the child's individual circumstances, including SEND needs.

**Simple Staff Rule**

**"Could this information help keep a child safe, healthy or supported?"**

If the answer is **yes** or **maybe**, share it with the DSL immediately and record on CPOMS.

Full Guidance: ***Statutory Guidance Information Sharing*** Response to consultation on draft statutory guidance for the information sharing duty