Child protection and safeguarding policy

William Byrd Primary School

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Contents

1. Important contacts 4
2. Purpose 4
3. Our ethos 5
4. Legislation and statutory guidance 5
5. Definitions 7
6. Equality statement 9
7. Roles and responsibilities 10
8. Roles and responsibilities of all staff 10
9. Roles and responsibilities of the designated safeguarding lead (DSL) 12
10. Role and responsibilities of the Trust Board 13
11. Role and responsibilities of the local governing bodies 15
13. Roles and responsibilities of virtual school heads 16
14. Confidentiality 16
15. Recognising abuse and taking action 18
16. Online safety and the use of mobile technology 30
17. Toilets 32
18. Notifying parents or carers 33
19. Pupils with special educational needs, disabilities or health issues 33
20. Pupils with a social worker 34
21. Children looked after or previously looked after 34
22. Pupils who are young carers 35
23. Children who are lesbian, gay, bisexual or gender questioning 35
24. How we teach pupils about safeguarding 36
25. Working with pupils, parents and carers 37
26. Child protection conferences 38
27. Complaints and concerns about school safeguarding policies 39
27.1. Complaints against staff 39
27.2. Other complaints 39
27.3. Whistleblowing 39
28. Record keeping 39
28.13. Local record keeping arrangements 40
29. Training 41

29.1. All staff 41
29.2. The DSL and deputies 41
29.3. Trustees and local governors 41
29.4. Recruitment- interview panels 42
29.5. Staff who have contact with pupils and families 42
30. Monitoring arrangements 42
31. Links with other policies 42
Appendix 1: Types of abuse 44
Appendix 2: Safer recruitment and DBS checks – policy and procedure 46
Appendix 3: Allegations of abuse made against staff 52
Appendix 4: Specific safeguarding issues 61

1.

2. Important contacts

1.1. **William Byrd Primary Academy**

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Jenna Malcom-Naulls	Jnaulls@williambyrd.school
DSL	Nicola Edwards	nedwards@williambyrd.school
DSL	Saqib Tamimi	stamimi@williambyrd.school
Deputy DSL	Melanie Castle-Mason	Mcastle-mason@williambyrd.school
Deputy DSL	Kate Verone	kverone@williambyrd.school
Deputy DSL	Charlotte Owen	cowen@williambyrd.school
Chair of Governors	Barbara Turner	bturner@mlp.org.uk
Safeguarding Governor	Labina Basit	lbasit@mlp.org.uk

Role	Name	Contact details
Simon Arnold	Chair of Trust Board	sarnold@mlp.org.uk
Mike Ormerod	Safeguarding Trustee	mormerod@mlp.org.uk

If you have a concern about a child outside of school hours, please contact Hillingdon Stronger Families Hub on 01895 556006.

2. Purpose

2.1. William Byrd Primary's safeguarding policy ensures every child is safe, protected from harm and supported to thrive. This means we will always work to ensure:

a) Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
b) All staff are aware of their statutory responsibilities in respect of safeguarding.
c) All staff are appropriately trained in recognising and reporting safeguarding issues.
d) We Identify children and young people who may need extra help.
e) Vulnerable pupils and those known to social services are adequately monitored and supported.

2.2. This policy will provide clear direction to staff, volunteers, visitors, parents, and carers about expected behaviour and our responsibilities to safeguard and promote the welfare of all children and young people.

2.3. The school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of pupils within the school. The elements of our policy are prevention, protection, and support.

3. Our ethos

3.1. The child's welfare is of paramount importance. William Byrd Primary School will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to, and are safe. Children will be able to talk openly to any member of staff if they are worried or concerned about something.

3.2. Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that school staff play a particularly important role as they can identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

3.3. All staff and regular visitors will, through induction and training, know how to recognise emerging needs and indicators of concern, how to respond to a disclosure from a child and how to record and report this information. They will not make promises to any child and will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose should it outline a safeguarding concern.

3.4. At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children.

3.5. Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our children to develop essential life skills.

4. Legislation and statutory guidance

4.1. This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by Hillingdon Safeguarding Partnership.

4.2. This policy is also based on the following legislation:

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

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

c) 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.

d) Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

e) The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

f) Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

g) 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.

h) 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).

i) The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

j) 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.

k) 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.

l) The Crime and Policing Bill Act 2026, which includes the requirements relating to security/vetting checks including requirements for enhanced DBS and the children's barred list.

m) Children Missing Education guidance.

n) Preventing and Tackling Bullying 2017

o) Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (February 2022)
p) What to do if you're worried a child is being abused, DfE (March 2015)
q) Information sharing: advice for practitioners providing safeguarding services (September 2026)
r) Child Sexual Exploitation: A definition and guide for practitioners, local leaders and decision makers DfE (2017)
s) Criminal exploitation of children and vulnerable adults: county lines
t) Meeting Digital and Technology Standards in Schools and Colleges (March 2025)
u) Working together to improve school attendance (July 2026)
v) Sharing nudes and semi-nudes: how to respond to an incident (overview) guidance
w) Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension
x) Searching, screening and confiscation in schools
y) The London Safeguarding Children Procedures

4.3. This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

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

5. Definitions

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

5.2. **Safeguarding and promoting the welfare of children means**:

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

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

5.4. **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or

experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children.

5.5. Abuse is often categorised in to four types of harm; neglect, physical, sexual, or emotional. For definitions of these individual categories of harm, see Working Together to Safeguard Children.

5.6. **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. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

5.7. **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.

5.8. **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.

5.9. **Making and sharing of nudes and semi-nudes** is the creation, sending or posting of nude and semi-nude images by young people under the age of 18; including all visual content such as photographs, videos and livestreams. This includes content generated or altered by artificial intelligence (AI).

5.10. 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:

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

6. Equality statement

6.1. 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.

6.2. We give special consideration to children who:

a) Are disabled or have certain health conditions and has specific additional needs (see section 19).

b) Have special educational needs (SEN) whether or not they have a statutory Education, Health and Care Plan) (see section 19).

c) Have a mental health need (see section.15.5)

d) Are young carers (see section 22).

e) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.

f) Have English as an additional language.

g) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.

h) Are at risk of honour or faith-based abuse such as female genital mutilation (FGM) or forced marriage.

i) Are at risk of modern slavery and exploitation, including criminal exploitation.

j) Are asylum seekers.

k) Are at risk of being radicalised into terrorism.

l) Are at risk of sexual exploitation

m) Are at risk due to either their own or a family member's mental health needs.

n) Are looked after or previously looked after (see section 21).

o) Are missing from education.

p) Whose parent/carer has expressed an intention to remove them from school to be home educated.

q) Have exhibited early signs of abusive, violent and/or harmful behaviours.

r) Have shown signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

s) Have been repeatedly removed from the classroom, experienced multiple suspensions, on a part-time timetable and/or at risk of being permanently excluded from schools;'

t) Is a privately fostered child.

u) Are persistently absent or display patterns of frequent absence across the academic year.

7. Roles and responsibilities

7.1. Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, local governors and trustees across our trust and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

7.2. The trust and school play a crucial role in preventative education. This is in the context of a whole-trust 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 the school's:

a) Behaviour policy

b) Pastoral support system

c) Staff code of conduct

d) 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;
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support; and,
- What constitutes sexual harassment and sexual violence and why they're always unacceptable.

8. Roles and responsibilities of all staff

8.1. All staff will:

a) Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (2026) in full, and review this guidance at least annually.

b) Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

c) 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).

d) Provide a safe space for pupils who are LGBT to speak out and share their concerns.

e) Embed their understanding that it could happen at their school and display vigilance when identifying and reporting safeguarding concerns.

8.2. All staff will be aware of:

a) Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, anti-bullying policy, and the online safety policy (including monitoring and filtering procedures in place) and the safeguarding response to children who go missing from education;

b) The 'early help' process (sometimes known as the common assessment framework or the family help assessment) 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;

c) 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;

d) 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;

e) 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);

f) The importance of reassuring all children that they are being taken seriously and that they will be supported and kept safe;

g) The fact that children can be at risk of harm inside and outside of their home, at school and online;

h) The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children; and

i) What to look for to identify children who need help or protection.

8.3. Section 29.1 of this policy outlines in more detail how staff are supported to do this; with further information provided in annexes 1 and 4.

9. Roles and responsibilities of the designated safeguarding lead (DSL)

9.1. The DSL is a senior member of staff from the leadership team who takes lead responsibility for safeguarding and child protection in our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of Keeping Children Safe in Education.

9.2. The DSL at William Byrd Primary School is **Jenna Malcom-Naulls.**

9.3. During term time, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns. If in exceptional circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and any other relevant media.

9.4. The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers, and regular visitors have received appropriate child protection information during induction and that appropriate training needs are identified.

9.5. The DSL will maintain written records and child protection files ensuring that they are kept confidential and stored securely.

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

a) Provide advice and support to other staff on child welfare and child protection matters;

b) Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;

c) Contribute to the assessment of children;

d) 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; and

e) Have a good understanding of harmful sexual behaviour.

9.7. The DSL will also:

a) Keep the Head of School informed of any issues;

b) Liaise with local authority case managers and designated officers for child protection concerns as appropriate;

c) 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;

d) 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;

e) Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search; and

f) Liaise with the Trust's IT providers and the Computing subject lead to ensure rigorous monitoring and filtering systems are in place. In addition to this, conduct regular monitoring is in place of staff and children's internet usage. At MLP, this is done through the programme Senso.

9.8. The DSL will also keep the Headteacher informed of any issues and liaise with Local Authority case managers for child protection concerns as appropriate.

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

10. Role and responsibilities of the Trust Board

10.1. The Trust Board is accountable for ensuring the effectiveness of this policy and the school's compliance with it. Although the board takes collective responsibility for safeguarding and promoting the welfare of our pupils. We also have a named Safeguarding Trustee who oversees safeguarding across the school –

10.2. The Trust Board will:

a) Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;

b) Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the heads of school to account for its implementation;

c) 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; and

d) Appoint a senior board level (or equivalent) lead and link governors to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

10.3. Make sure:

a) The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;

b) William Byrd Primary School contributes to inter-agency working in line with Working Together to Safeguard Children;

c) All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct; and that all staff undertake appropriate child protection training annually;

d) The safeguarding policy is in place and is reviewed annually, is available publicly via our website and has been written in line with Hillingdon expectations and the requirements of William Byrd Primary policies and procedures;
e) Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies;
f) The board will consider the number of and age range of pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
g) The trust 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;
h) 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;
i) Safer recruitment practices are followed in line with the requirements of Keeping Children Safe in Education.
j) 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
k) The Trust Board remedy without delay any weakness regarding our safeguarding arrangements that are brought to their attention.
l) That this policy reflects children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
m) 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

10.4. The Chair of the Trust Board will appoint a 'case manager' in the event that an allegation of abuse is made against the head of school, where appropriate (see appendix 3).

10.5. All trustees and local governors will read Keeping Children Safe in Education in full, will complete Level 1 safeguarding training, FGM and Prevent training.

10.6. At agreed intervals the Safeguarding Trustee will receive a safeguarding report that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils.

10.7. Section 29.3 has information on how trustees and local governors are supported to fulfil their role.

11. Role and responsibilities of the local governing bodies

11.1. Governors on local governing bodies (LGBs) will review the school-specific elements of the policy after the trust level policy has been reviewed and approved.

11.2. They will also hold the Headteacher to account for the implementation of the policy.

11.3. We will appoint a member of each local governing body to act as the governor responsible for safeguarding, to liaise with the school DSL on local safeguarding issues and report to the trust.

11.4. The safeguarding governor for William Byrd LGB is Labina Basit.

12. Role and responsibility of the Headteacher

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

a) Ensuring that staff (including temporary staff) and volunteers:
   - Are informed of our systems which support safeguarding, including this policy, as part of their induction; and
   - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

b) Identifying a member of staff to be the Designated Safeguarding Lead (DSL) and ensuring that the DSL has appropriate time, funding, training and resources.

c) Identifying additional members of staff to act as Deputy Designated Safeguarding Lead (DDSL) in their absence to ensure there is always cover for the role.
d) Communicating this policy to parents/carers when their child joins the school and via the school website;
e) Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly;
f) Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
g) Liaise with the Designated Officer from the Local Authority in the event of an allegation of abuse being made against a member of staff or volunteer;
h) 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);
i) Identify and assign roles and responsibilities to manage filtering and monitoring systems;
j) Review filtering and monitoring provision at least annually;
k) Ensure harmful and inappropriate content is blocked, without unreasonably impacting teaching and learning;
l) Ensure effective filtering and monitoring strategies are embedded to meet the school's safeguarding needs;
m) Ensuring that the procedures for the management of low-level concerns in respect of staff and volunteers is adhered to, with LADO consultation as appropriate;
n) Ensuring the relevant staffing ratios are met, where applicable;
o) Making sure each child in the Early Years Foundation Stage is assigned a key person; and
p) Ensuring a positive culture of safeguarding permeates throughout the school.

13. Roles and responsibilities of virtual school heads

13.1. 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.

13.2. They should also identify and engage with key professionals, e.g. DSLs, SENDCOs, social workers, mental health leads and others.

14. Confidentiality

14.1. Timely information sharing is essential to effective safeguarding

14.2. 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

14.3. 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.

14.4. 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

14.5. 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

14.6. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

a) 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

b) The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

c) 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 through the Hillingdon Stronger Families Hub.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration (whether by a part of a person's body or by an object) 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

14.7. Regarding anonymity, all staff will:

a) 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

b) 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

c) Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

14.8. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

14.9. Confidentiality is also addressed in this policy with respect to record-keeping in section 28, and allegations of abuse against staff in appendix 3.

15. Recognising abuse and taking action

Staff, volunteers, trustees and local 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)".

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

15.1.1. Make a referral to children's social care (Hillingdon Stronger Families Hub) and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

15.1.2. Tell the DSL as soon as possible if you make a referral directly. Once you have told the DSL, promptly log all of the details of the disclosure and referral on CPOMS using the pupil's language.

15.1.3. At William Byrd Primary Academy the DSL/Deputies:

a) Will refer a child if there are concerns about possible abuse, Hillingdon's Stronger Families Hub, and act as a focal point for staff to discuss concerns. Enquiries must be followed up in writing, if referred by telephone;

b) Will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral;

c) Will ensure that all such records are kept confidential, stored securely and are separate from pupil records, until the child's 25th birthday;

d) Will ensure that an indication of the existence of the additional file is marked on the pupil records;

15.1.4. In an emergency out of hours referrals can be made to the Emergency Duty Team on **01895 250 111 or the Police.**

15.1.5. Further information about reporting child abuse to the local council can be found here https://www.gov.uk/report-child-abuse-to-local-council

15.2. If a child makes a disclosure to you

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

a) Listen to and believe them. Allow them time to talk freely and do not ask leading questions;
b) Stay calm and do not show that you are shocked or upset;
c) Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
d) Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
e) 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;
f) Sign and date the write-up and pass it on to the DSL through CPOMS. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 5.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

15.2.2. Bear in mind that some children may:
a) Not feel ready, or know how to tell someone that they are being abused, exploited or neglected;
b) Not recognise their experiences as harmful;
c) Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

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

15.2.4. and speaking to the DSL if you have concerns about a child.

15.3. **If you discover that FGM has taken place or a pupil is at risk of FGM**

15.3.1. 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".

15.3.2. 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'.

15.3.3. 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.

15.3.4. Any teacher who either:

a) Is informed by a girl under 18 that an act of FGM has been carried out on her; or

b) 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.

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

15.3.6. 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.

15.3.7. 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.

15.3.8. 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.

15.3.9. The member of staff should personally make a report to the police force in which the girl resides by calling 101.

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

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

15.4.2. 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.

15.4.3. 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

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

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

15.4.6. 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.

15.4.7. All referrals for Hillingdon Borough Agencies for services are to go through to the 'Stronger Families Hub': strongerfamilieshub@hillingdon.gov.uk 01895556006

Referral

15.4.8. 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.

15.4.9. If you make a referral directly (see section 15.1), you must tell the DSL as soon as possible.

15.4.10. 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.

15.4.11. 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.

15.4.12. All referrals for Hillingdon Borough Agencies for services are to go through to the 'Stronger Families Hub': strongerfamilieshub@hillingdon.gov.uk 01895556006

15.5. **If you have a concern about a child's mental health**

15.5.1. Mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

15.5.2. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; however, 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.

15.5.3. Behavioural signs that could suggest that a child is experiencing or is at risk of developing a mental health problem could include:

a) Significant changes in behaviour;
b) Ongoing difficulty sleeping;
c) Withdrawing from social sitiations;
d) not wanting to do things they usually like; and
e) physical signs of self-harm or neglecting themselves.
f) Emotion based school non-attendance (EBSNA)

15.5.4. 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 15.1-15.4.

15.5.5. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL/SENDCO to agree a course of action and explore further internal and external support.

15.5.6. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

15.5.7. Further information/guidance can be found in the Department for Education guidance on mental health and behaviour in schools

15.6.1. 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.

15.6.2. 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.

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

15.6.4. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff, trustees and local 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.

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

a) Think someone is in immediate danger

b) Think someone may be planning to travel to join an extremist group

c) See or hear something that may be terrorist-related

15.6.6. Our local procedures would include contacting the Hillingdon Prevent Lead: **Fiona Gibbs** fgibbs@hillingdon.gov.uk **Mobile: 07946714637**

15.7.1. 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 Head of School as soon as possible. If the concerns/allegations are about the Head of School, speak to the Executive Headteacher (Chief Executive Officer). If the concerns/allegations relate to the EHT/CEO, speak to the Trust Chair.

15.7.2. The Head of School/Executive Headteacher/Chair of Trustees will then follow the procedures set out in appendix 3, if appropriate.

15.7.3. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Head of School, report it directly to the Local Authority Designated Officer (LADO).

15.7.4. Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

15.8.1. 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.

15.8.2. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse, including harassment and violence, is unacceptable and will be taken seriously.

15.8.3. 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:

a) Is serious, and potentially a criminal offence;

b) Could put pupils in the school at risk;

c) Is violent;

d) Involves pupils being forced to use drugs or alcohol;

e) Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes).

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

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

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

a) You must record the allegation and tell the DSL, but do not investigate it;

b) 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;

c) 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);

d) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate. The DSL may also deploy other community agencies such as Axis and KISS to support these behaviours.

15.8.6. 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.

15.8.7. Further actions that the school could undertake include:

a) The DSL and/or appropriate member of staff (e.g. Pastoral Manager) will oversee the support for the victims, perpetrators and any other children affected as necessary and where appropriate will keep parents and carers informed to support the individuals

b) The DSL where appropriate and with parental consent will make contact with the Stronger Families Hub

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

15.8.8. 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.

15.8.9. To achieve this, we will:

a) Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;

b) 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;

c) Ensure our curriculum helps to educate pupils about appropriate behaviour and consent;

d) Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 15.11 below);

e) Ensure staff reassure victims that they are being taken seriously;

f) 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;

g) 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;

h) Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment;

i) Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes.

j) Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;

k) 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.
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

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

15.8.11. 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:

a) Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.

b) 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.

Your responsibilities when responding to an incident

15.9.1. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nude images/videos, you must report it to the DSL immediately.

15.9.2. **You must not:**

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

b) Delete the imagery or ask the pupil to delete it

c) Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

d) Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

e) Say or do anything to blame or shame any young people involved

15.9.3. 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

15.9.4. 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:

a) Whether there is an immediate risk to pupil(s);

b) If a referral needs to be made to the police and/or children's social care

c) 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)

d) What further information is required to decide on the best response

e) Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

f) Whether immediate action should be taken to delete or remove images or videos from devices or online services

g) Any relevant facts about the pupils involved which would influence risk assessment

h) If there is a need to contact another school, college, setting or individual

i) Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

a) The incident involves an adult;

b) 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);

c) 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;

d) The imagery involves sexual acts and any pupil in the images or videos is under 13;

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

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

Further review by the DSL

15.9.7. 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.

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

15.9.9. 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

15.9.10. 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

15.9.11. If it is necessary to refer an incident to the police, this will be done through contacting the Designated Ward Officer – Children and Young People (DWO-CYP) or by dialling 101.

Recording incidents

15.9.12. All incidents of making or sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS. The record-keeping arrangements set out in section 28 of this policy also apply to recording these incidents.

Curriculum coverage

15.9.13. The below is provided as an example of how you might demonstrate the way your curriculum covers the making and sharing of nudes and semi-nudes. Insert details of your own approach here.

15.9.14. Pupils are taught about the issues surrounding the sharing of personal images as part of our Personal, Social, Health and Relationship Education Policy and computing programmes. Teaching covers the following in relation to the sharing of personal images:

a) What it is

b) How it is most likely to be encountered

c) 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

d) Issues of legality

e) The risk of damage to people's feelings and reputation

15.9.15. Pupils also learn the strategies and skills needed to manage:

a) Specific requests or pressure to provide (or forward) such images

b) The receipt of such images

15.9.16. This policy on the making and 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.In the event the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (e.g. community groups, sports clubs or services that run extra-curricular activities), the usual safeguarding policy and procedures would be followed, including informing the LADO.

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

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

15.11.3. To achieve this, we will:

a) Put systems in place for pupils to confidently report abuse;

b) Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils;

c) Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback;

d) Signpost to pupils 'Who can help you' through visual posters throughout the school;

e) Pupils are made aware of reporting systems though, PSHRE discussions, assemblies, and other curriculum areas (this is monitored through pupil surveys);

f) DSL/deputies support children in submitting concerns and provide reassurances following disclosures;

g) Children can identify nominated individuals who they feel may provide them additional support/ reassurance.

15.11.4. William Byrd Primary Academy promotes the importance of feeling safe and comfortable by:

a) Encouraging pupils to report concerns to adults and reminding pupils them of adults who can help though 'Who can Help' posters, discussions within PSHE curriculum and promotion of and referral to the Pastoral Manager and Mental Health Lead;

b) Pupils will be shown the location of offices of key adults which will allow the children to report abuse in a space outside of the classroom;

c) Pupils will be kept informed of what will happen as a result of submitting concerns, and will be supported to assist in making decisions for desired outcomes (within reason);

d) Posters and information is promoted and shared with pupils about other agencies that can support them within the ICT and PSHE curriculum and posters up within school.

16. Online safety and the use of mobile technology

16.1. 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.

16.2. To address this, the school aims to:

a) Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors;

b) 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');

c) Set clear guidelines for the use of mobile phones for the whole school community; including the expectation that our school is a mobile phone-free environment by default. Year 6 pupils who walk home alone are admitted to bring their phone into class but are required to hand it to their class teacher who locks it away until the end of the day.

d) Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

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

16.4. **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

16.5. **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: 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.

16.6. **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual making and sharing of nudes and semi-nudes and/or pornography, sharing other explicit images (including those generated by AI) and online bullying, and

16.7. **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

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

a) Educate pupils about online safety as part of our curriculum. For example:
   - The safe use of social media, the internet and technology;
   - Keeping personal information private;
   - How to recognise unacceptable behaviour online;
   - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

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

c) 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.

d) 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.

e) 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.

f) 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.

g) 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.

h) Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems, and to review the effectiveness of this annually Filtering and monitoring requirements also apply to your use of generative AI – see section 16.10-16.13 below.
i) 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

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

Artificial intelligence (AI)

16.10. 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.

16.11. William Byrd Primary School 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.

16.12. William Byrd Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-Bullying policy.

16.13. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Staff are prohibited from putting pupil images or personal details into generative AI applications.

17. Toilets

17.1. Toilets facilities provided include mixed-sex provision, with individual, lockable cubicles directly next to public areas, and single-sex toilets. Children are not allowed into the toilet facilities designated for the opposite biological sex, including where schools are responding to a request to support any degree of social transition for children questioning their gender (see section 23).

17.2. In the event that a gender-questioning child does not want to use the toilet designated for their biological sex, schools we will review the options to provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. Any alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child, or of any other children. A record of any specific arrangement made will be kept and communicated appropriately and regularly reviewed.

18. Notifying parents or carers

18.1. 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.

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

18.3. 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.

18.4. 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.

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

18.6. 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

18.7. 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)

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

19.1. We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

19.2. We offer extra pastoral support for these pupils. For further information, please refer to our SEND Policy and Information Report.

19.3. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy), the SENDCo and Pastoral Manager.

19.4. In safeguarding children with medical conditions, an incident relating to management of a child's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners, a safeguarding referral would only be needed where an incident highlighted concern that the child may be at an increased risk of being neglected, abused or exploited by persons inside or outside their family unit because of their medical condition. This might occur where relevant information about a child's medical condition is not provided to the school, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

20. Pupils with a social worker

20.1. 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.

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

20.3. 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:

a) Responding to unauthorised absence or missing education where there are known safeguarding risks;
b) The provision of pastoral and/or academic support.

21. Children looked after or previously looked after

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

a) 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
b) The DSL has details of children's social workers and relevant virtual school heads

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

- **William Byrd Designated Teacher: Jenna Malcom-Naulls**

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

21.4. As part of their role, the designated teacher will:

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

22. Pupils who are young carers

22.1. We are aware of the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services. Young Carers receive weekly dedicated sessions to allow them to access resources, have allocated time where they are not a carer and have space to discuss their concerns.

23. Children who are lesbian, gay, bisexual or gender questioning

23.1. The fact that a child or a young person may be lesbian, gay, bisexual or gender questioning is not in itself safeguarding issue, however, children who are can be targeted by other children.
23.2. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender questioning.
23.3. We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.
23.4. We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour/antibullying policies for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.
23.5. When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach, and follow the guidance outlined in sections 254-284 of KCSIE 2026.
23.6. Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority. However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

23.7. Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

23.8. The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

23.9. Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved.

23.10. In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

23.11. The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.

23.12. Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered.

23.13. Accommodating social transition is an active intervention so the school will take a very careful approach:social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes.

23.14. The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

23.15. The school will ensure that the decision-making process is documented and records are kept.

23.16. The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

24. How we teach pupils about safeguarding

24.1. William Byrd Pupils are taught about safeguarding through the following:

a) Personal, social and health education (PSHE) curriculum.
b) Relationship sex education (RSE) curriculum.

c) All pupils are notified as to the identity of the DSL and Deputy and how to contact them.
d) Pupils are taught how to keep themselves safe online and this is outlined in the E-Safety policy.

24.2. We understand that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

24.3. Our Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. We focus on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. We recognise that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

24.4. We have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching Relationships Education

24.5. Our RE/RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers we will use. The school proactively engages and consults parents in the development and review of this policy. Parents will be informed of their right to request that their child is withdrawn from sex education.

25. Working with pupils, parents and carers

25.1. William Byrd Primary is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

25.2. When children join William Byrd Primary parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents/carers on request and is available on our website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Social Care.

25.3. We are committed to working with parents positively, openly, and honestly. We ensure that all parents/carers are treated with respect, dignity, and courtesy. We respect parents'/carer's rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to safeguard a child from harm.

25.4. We will seek to work together with parents to support any worries or concerns we may have about their child unless to do so may place a child at increased risk of harm.
25.5. To keep children safe and provide appropriate care for them, William Byrd Primary requires parents/carers to provide accurate and up to date information regarding:
  a) Full names and contact details of all adults with whom the child normally lives.
  b) Full names and contact details of all persons with parental responsibility (if different from above) and contact details of a significant adult (a minimum of 3 contacts per child).
  c) Emergency contact details (if different from above).
  d) Full details of any other adult authorised by the parent to collect the child (if different from the above).
25.6. William Byrd Primary will retain this information on file. Information about children will only be shared with adults who have parental responsibility for that child or with those for whom an individual with parental responsibility has given permission, and we have been supplied with the adult's full details in writing.

26. Child protection conferences

26.1. In some circumstances, all professionals involved with a child will be expected to support statutory agencies and provide information relating to the welfare of a child and how to support a child/children and their parent/s or carer/s. One such example is at a child protection conference. There may be circumstances where William Byrd Primary may be asked to participate in Child Protection processes pursuant to the Children Act 1989.
26.2. Children's Social Care will convene an Initial Child Protection Conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a
26.3. Child Protection Plan to monitor the safety of the child and the required reduction in risk.
26.4. Staff members may be asked to attend a Child Protection Conference or Core Group meeting on behalf of William Byrd Primary. Usually, the person representing the school at these meetings will be the DSL. In any event, the person attending will need to have as much relevant, up to date information about the child as possible; any member of staff may be required to contribute to this process.
26.5. All reports for Child Protection Conferences will be prepared in advance using the guidance and template report provided by the relevant Local Authority Children's Social Care team. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional, and academic development and the child's presentation at school. To complete such reports, all relevant information will be sought from staff working with the child.

26.6. Clearly Child Protection Conferences can be upsetting for parents. We recognise that we may have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Social Care or whose child is subject to a Child Protection plan. Our responsibility is to promote the protection and welfare of all children, and our aim is to achieve this in partnership with our parents.

26.7. Professional disagreement and escalation of concerns

26.8. When Dealing with Disagreement and Escalation of Concerns, the DSL or other appropriate member of staff will:

a) Contact the line manager in Children's Social Care if they consider that the child is not being adequately safeguarded by the child protection plan and follow this up in writing.

b) Use the relevant Local Authority Safeguarding Children Partnership Escalation Procedures if this does not resolve the concern. Hillingdon's can be found here.

27. Complaints and concerns about school safeguarding policies

27.1. Complaints against staff

27.1.1. 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).

27.2. Other complaints

27.2.1. Other complaints will be handled in accordance with our complaints procedure.

27.3. Whistleblowing

27.3.1. Concerns about the school's safeguarding practice can be raised under the whistleblowing policy.

28. Record keeping

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

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

28.3. Records will include:

a) A clear and comprehensive summary of the concern;

b) Details of how the concern was followed up and resolved;

c) A note of any action taken, decisions reached and the outcome.

28.4. Concerns and referrals will be kept in a separate child protection file for each child.
28.5. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
28.6. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
28.7. Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
28.8. 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.
28.9. To allow the new school/college to have support in place when the child arrives, this should be within:
a) 5 days for an in-year transfer, or
b) the first 5 days of the start of a new term.
28.10. 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.
28.11. Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.
28.12. Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

28.13. Local record keeping arrangements

28.13.1. Further information about our safeguarding record-keeping arrangements include:
a) Our records held electronically via the CPOMS platform. Any hand written records/information/notes will be scanned and entered onto the CPOMS system, and then shredded to ensure confidentiality.
b) CPOMS uses two factor authentication for access to ensure secure record keeping.
c) All staff can record concerns directly to the platform.
d) Only designated staff have access to the information recorded on the CPOMS platform.
28.13.2. When sharing information with other agencies this will be through a secure platform, through attending agency meetings and telephone conversations when requested and in line with relevant GDPR and Data protection procedures.

29. Training

29.1. All staff

29.1.1. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

29.1.2. This training will be regularly updated and will:

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

b) Be in line with advice from the 3 safeguarding partners

c) Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

d) 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

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

29.1.4. 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).

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

29.1.6. Volunteers will receive appropriate training, if applicable.

29.2. The DSL and deputies

29.2.1. The DSL and deputies will undertake child protection and safeguarding training every year.

29.2.2. 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).

29.2.3. They will also undertake Prevent awareness training.

29.3. Trustees and local governors

29.3.1. All trustees and local governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

29.3.2. A person appointed by the chair of trustees to act as 'case manager' in the event that an allegation of abuse is made against the head of school will receive training in managing allegations for this purpose.

29.4. Recruitment- interview panels

29.4.1. 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.

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

29.5. Staff who have contact with pupils and families

29.5.1. All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

30. Monitoring arrangements

30.1. This policy will be reviewed annually by the CEO, in conjunction with DSLs. At every review, it will be approved by the Trust Board. records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

31. Links with other policies

31.1. This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid

- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Anti- bullying Policy
- SEND Policy
- Social Media

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, such as acts of penetration, whether by part of a person's body or by an object (e.g rape or assulat by penetration), and non-penetrative acts such as masturbation, kissing, rubbing and touching over 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.
- Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.
- There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

- **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 procedure

1. **Recruitment and selection process**
   1.1. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
   1.2. 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.
   1.3. In undertaking all recruitment and selection, the trust and the schools will comply with the requirements as set out in Keeping Children Safe in Education 2026 (KCSIE) or any subsequent updates to statutory guidance and relevant legislation.

2. **Advertising**
   2.1. When advertising roles, we will make clear:
      a) Our trust's commitment to safeguarding and promoting the welfare of children
      b) That safeguarding checks will be undertaken
      c) The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
      d) 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.

3. **Application forms**
   3.1. Our application forms will:
      a) 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);
      b) Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

4. **Shortlisting**
   4.1. Our shortlisting process will involve at least 2 people and will:
      a) Consider any inconsistencies and look for gaps in employment and reasons given for them;
      b) Explore all potential concerns.
   4.2. Once we have shortlisted candidates, we will ask shortlisted candidates to:
      a) Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
         a. If they have a criminal history;
         b. Whether they are included on the barred list;

c. Whether they are prohibited from teaching;

d. Information about any criminal offences committed in any country in line with the law as applicable in England and Wales;

e. Any relevant overseas information.

b) Sign a declaration confirming the information they have provided is true.

4.3. We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

5. Seeking references and checking employment history

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

5.2. When seeking references we will:

a) Not accept open references;
b) Liaise directly with referees and verify any information contained within references with the referees;
c) 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;
d) Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
e) Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
f) Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate;
g) Resolve any concerns before any appointment is confirmed.

6. Interview and selection

6.1. When interviewing candidates, we will:

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

7. Pre-appointment vetting checks

7.1. We will record all information on the checks carried out in the trust'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.

7.2. New staff

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

a) Verify their identity
b) 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

c) Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
d) Verify their mental and physical fitness to carry out their work responsibilities
e) 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
f) Verify their professional qualifications, as appropriate
g) Ensure they are not subject to a prohibition order if they are employed to be a teacher
h) Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

   a. For all staff, including teaching positions: criminal records checks for overseas applicants

   b. 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

i) Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

7.2.3. Where required by the relevant legislation: 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.

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

a) Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
b) Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
c) Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.
d) This includes any volunteer role that involves teaching, training, instructing or supervising children for more than 3 days within a 30-day period or overnight.

8. Existing staff

8.1. 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:

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

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

a) We believe the individual has engaged in relevant conduct; or
b) 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
c) 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
d) The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

9. Agency and third-party staff

9.1. 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; and in the case where an enhanced DBS is required, require written confirmation that the certification was obtained by the employment business or another such business. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

10. Contractors

10.1. 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:

a) An enhanced DBS check with barred list information for contractors engaging in regulated activity
b) 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

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

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

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

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

10.6. Where required by the relevant legislation: 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.

11. Trainee/student teachers

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

11.2. 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.

11.3. Where required by the relevant legislation: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

12. Volunteers

12.1. We will:

a) Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;

b) Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;

c) 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.

d) Where required by the relevant legislation: 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.

e) For existing volunteers whose role is newly considered regulated activity, we will complete checks on their children's barred list status ahead of obtaining an enhanced DBS check, or to supplement a recently obtained enhanced DBS check without children's barred list information.

f) We will not permit volunteers to work in the settings covered within the EYFS framework until an enhanced DBS certificate including barred list information has been obtained.

13. Trustees, members and local governors

13.1. All trustees, local governors and members will have an enhanced DBS check without barred list information.

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

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

13.4. All proprietors, trustees, local governors and members will also have the following checks:

a) 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);

b) Identity;

c) Right to work in the UK;

d) Other checks deemed necessary if they have lived or worked outside the UK.

14. Staff working in alternative provision settings

14.1. 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.

15. Adults who supervise pupils on work experience

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

15.2. 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.

16. Pupils staying with host families

16.1. 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.

16.2. 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.

Appendix 3: Allegations of abuse made against staff

1. Section 1: allegations that may meet the harms threshold

1.1. 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:

a) Behaved in a way that has harmed a child, or may have harmed a child, and/or

b) Possibly committed a criminal offence against or related to a child, and/or

c) Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or

d) 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

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

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

1.4. A 'case manager' will lead any investigation. This will be the head of school, or a person appointed by the chair of trustees where the head of school is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

2. Suspension of the accused until the case is resolved

2.1. 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. The school will always work in conjunction with the LADO.

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

a) Redeployment within the school so that the individual does not have direct contact with the child or children concerned

b) Providing an assistant to be present when the individual has contact with children

c) Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

d) 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

e) Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust

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

3. Definitions for outcomes of allegation investigations

3.1. **Substantiated:** there is sufficient evidence to prove the allegation

3.2. **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

3.3. **False:** there is sufficient evidence to disprove the allegation

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

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

4. Procedure for dealing with allegations

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

a) 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

b) Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

c) Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

d) Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is

justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

e) Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

f) **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

g) **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

h) **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

i) 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. Support is also available from trade union representatives, a colleague, and the trust's employee support programme.

j) Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

k) 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)

l) 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

4.2. For early years provision: we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises

(whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

4.3. If the trust 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.

4.4. Where the police are involved, wherever possible the trust 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.

5. Additional considerations for supply teachers and all contracted staff

5.1. If there are concerns or an allegation is made against someone not directly employed by the trust, 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.

5.2. 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.

5.3. The Trust Board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school/trust, while the school carries out the investigation.

5.4. We will involve the agency fully, but the school/trust will take the lead in collecting the necessary information and providing it to the LADO as required.

5.5. 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).

5.6. 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.

6. Timescales

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

a) Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

b) If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

c) If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

7. Specific actions

7.1. Action following a criminal investigation or prosecution

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

7.2. Conclusion of a case where the allegation is substantiated

7.2.1. 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 trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

7.3. Individuals returning to work after suspension

7.3.1. 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.

7.3.2. 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.

7.4. Unsubstantiated, unfounded, false or malicious reports

7.4.1. If a report is:

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

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

7.5. Unsubstantiated, unfounded, false or malicious allegations

7.5.1. If an allegation is:

a) Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need

of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

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

8. Confidentiality and information sharing

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

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

b) Who needs to know about the allegation and what information can be shared

c) 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

d) What, if any, information can be reasonably given to the wider community to reduce speculation

e) How to manage press interest if, and when, it arises

9. Record-keeping

9.1. 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.

9.2. 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).

9.3. 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) A clear and comprehensive summary of the allegation

b) Details of how the allegation was followed up and resolved

c) Notes of any action taken, decisions reached and the outcome

d) A declaration on whether the information will be referred to in any future reference

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

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

10. References

10.1. When providing employer references, we will:

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

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

11. Learning lessons

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

11.2. This will include consideration of (as applicable):

a) Issues arising from the decision to suspend the member of staff;

b) The duration of the suspension;

c) Whether or not the suspension was justified;

d) 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.

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

12. Non-recent allegations

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

12.2. 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.

12.3. 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.

13. Section 2: concerns that do not meet the harm threshold

13.1. 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.

13.2. Concerns may arise through, for example:

a) Suspicion

b) Complaint

c) Safeguarding concern or allegation from another member of staff

d) Disclosure made by a child, parent or other adult within or outside the school

e) Pre-employment vetting checks

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

14. Definition of low-level concerns

14.1. 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:

a) Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

b) 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.

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

a) Being overly friendly with children;

b) Having favourites;

c) Taking photographs of children on their mobile phone;

d) Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;

e) Humiliating pupils.

15. Sharing low-level concerns

15.1. 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.

15.2. We will create this culture by:

a) 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;

b) Empowering staff to share any low-level;

c) Empowering staff to self-refer;

d) Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;

e) Providing a responsive, sensitive and proportionate handling of such concerns when they are raised;

f) Helping to identify any weakness in the school or trust's safeguarding system.

16. Responding to low-level concerns

16.1. If the concern is raised via a third party, the head of school will collect evidence where necessary by speaking:

a) Directly to the person who raised the concern, unless it has been raised anonymously

b) To the individual involved and any witnesses

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

16.3. 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]

17. Record keeping

17.1. 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.

17.2. Records will be:

a) Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.

b) Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.

c) Retained at least until the individual leaves employment at the school**.**

17.3. 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.

18. References

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

a) 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

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

Appendix 4: Specific safeguarding issues

Children missing from education

A child going missing 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 become missing from education, but some children are particularly at risk. These include children who:

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

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

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

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

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be committed or facilitated by an organised network or gang, and the victim may identify as

being part of this group. 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.

Some forms of CCE may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance; and in these instances where a potential victim is identified, the relevant child protection and modern slavery referral should be completed.

Child sexual exploitation

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

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

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

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

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

- Having an older boyfriend or girlfriend

- Suffering from sexually transmitted infections or becoming pregnant

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

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)
- Discriminatory behavior, including racism, faith-targeted abuse, and other prejudice based incidents
- Abuse in intimate personal relationships between peers (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)
- Serious physical assault and harm, or threat of harm with a weapon
- 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
- Other harmful sexual behavior including misogyny/misandry.
- 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 making and sharing of nude and semi-nudes, including those generated by AI.
- Upskirting (which is a criminal offence), 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 15.8 of this policy, as appropriate. In

particular, section 15.8.5 sets out more detail about our school's approach to this type of abuse.

We recognise that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator; and that child-on child abuse is preventable. Staff will be supported to understand and recognise behaviours and indicators of risk early, to be able to implement timely support with the aim of preventing instances of abuse or violence.

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 – for example, the impact of all forms of domestic abuse on children.

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 – if your local force is not, check your local procedures and adapt if necessary.

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 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.

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 by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others

- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, curriculum, behaviour policy, online/e-safety policy, and others.

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 stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting 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 and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

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

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

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 in via the electronic system or 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 LA 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 try to contact the parent/carer by phone. If contact can not be made to the parents/carers within half an hour, the school will try the other contact numbers that the parent/carer has provided.

Ideally, the child will be cared for by a member of staff that the child is familiar with (i.e. class teacher or a member of staff the child has regular contact with), while the parent/carer is located. It will be vital to reassure the child at this time.

If no identified contact can be reached after an hour, social care will be called to notify them of the situation in case further support is required.

A record will be kept of the incident to support monitoring of any potential further incidents on the school's 'Safeguard' system.

Missing pupils

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

- Notification by staff to DSL/SLT
- Early identification of child occurs
- Relevant staff notified to support entrance and exits

- Immediate full sweep of building by DSL/SLT teams
- If still not located police notified
- Notify Parents
- Key personnel begin local area sweep
- School staff follow further guidance from police