United Learning – Safeguarding Children and Child Protection Policies and Procedures

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1. Scope

This policy applies to all United Learning academy schools.

2. Implementation

The new version of this policy must be implemented by 1st September 2026

3. Summary of Requirements

Schools are required to amend this template policy, personalising and localising it as indicated. The policy must be approved by the Local Governing Body and published on the school website.

CHILD PROTECTION AND SAFEGUARDING POLICY

UNITED LEARNING TRUST

Whittingham Primary Academy

September 1st 2026

Date of last central office review:	JULY 2026	Review Period:	1 year (minimum)
Date of next central office review:	JULY 2027	Owner:	C Thompson
Date of next school level review:	September 2026		
Type of policy:	United Learning Policy	Group Board:	Group Board approves United Learning Template Policy
		Local Governing Body:	Approves completed school policy

The Policy will be reviewed annually, as set out below:	
Policy reviewed centrally	JULY 2026
Policy tailored by individual schools	July 2026
Policy ratified by Local Governing Bodies	July 2026
Policy approved by the Group Board	JULY 2026
Implementation of Group Policy	Autumn 2026

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	Gillian Nash TEL: 020 8496 3646 EMAIL: lado@walthamforest.gov.uk
Local Authority Children's Social Services	TEL: 0208 4962310 EMAIL: mashrequests@walthamforest.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8496 3000
Multi-Agency Safeguarding Hub	TEL: 0208 4962310 EMAIL: mashrequests@walthamforest.gov.uk
Support and Advice about Extremism	**Police** London Metropolitan Police Service EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: communitysafety@walthamforest.gov.uk **Local Authority** Waltham Forest EMAIL: prevent@walthamforest.gov.uk

	Department for Education NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gov.uk CONTACT FORM: https://report-extremism.education.gov.uk/ Anti-terrorist hotline: 0800 789 321
NSPCC's what you can do to report abuse dedicated helpline	TEL: 0808 800 5000 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	**Disclosure Service** ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk **Barring Service** ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom **TEL:** 03000 200 190
Teaching Regulation Agency	TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED (Concerns)	TEL: 0300 123 4666

KEY SCHOOL CONTACT DETAILS

United Learning Trust (ULT)	**Chair of ULT** Dame Reena Keeble EMAIL: company.secretary@unitedlearning.org.uk **Director of Trust Safeguarding** EMAIL: ben.antell@unitedlearning.org.uk **Regional Director (United Learning)** Karen Matthews EMAIL: karen.matthews@unitedlearning.org.uk **Head of Safeguarding**

	Frazer Smith EMAIL: frazer.smith@unitedlearning.org.uk **United Learning Safeguarding Officer** Sara Bryson EMAIL : sara.bryson@unitedlearning.org.uk
Local Governing Body (LGB)	**Chair of LGB** D Booth EMAIL: David.booth@winstonwayacademy.org.uk **Nominated Safeguarding Governor of LGB** D Booth EMAIL: David.booth@winstonwayacademy.org.uk **Nominated E-Safety Governor of LGB** D Booth EMAIL: David.booth@winstonwayacademy.org.uk
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)	**Main DSL for the School** C Thompson TEL: 020 8523 3228 EMAIL: Courtney.thompson@whittinghamprimaryacademy.org.uk **Deputy DSLs** R Noble TEL : 020 8523 3228 EMAIL: rachel.noble@whittinghamprimaryacademy.org.uk R Dasgupta TEL : 020 8523 3228 EMAIL : rukmini.dasgupta@whittinghamprimaryacademy.org.uk F Odutolu TEL : 020 8523 3228 EMAIL: Felix.OdutoluOlusanya@whittinghamprimaryacademy.org.uk S Tierney TEL : 020 8523 3228 EMAIL : susan.tierney@whittinghamprimaryacademy.org.uk

	EYFS DSL C Thompson TEL: 0208 523 3228 EMAIL: Courtney.thompson@whittinghamprimaryacademy.org.uk **Designated Online Safety Lead** C Thompson TEL: 0208 523 3228 EMAIL: Courtney.thompson@whittinghamprimaryacademy.org.uk
Designated Teachers for Looked After Children	C Thompson TEL: 0208 523 3228 EMAIL: Courtney.thompson@whittinghamprimaryacademy.org.uk
Head/Principal	C Thompson TEL: 0208 523 3228 EMAIL: Courtney.thompson@whittinghamprimaryacademy.org.uk

SCOPE

This policy applies to Whittingham Primary Academy ("the school") which includes the EYFS setting. United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website. This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education (DfE, current edition/publication)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)
- Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, 2025)
- Statutory Framework for the Early Years Foundation Stage (DfE, 2025)
- Equality Act (2010) – Including Public Sector Equality Duty
- The Human Rights Act (1998)

This policy also takes into account the procedures and practice of Waltham Forest and the published safeguarding arrangements set out by the local safeguarding partners multi-agency safeguarding hub (MASH) Waltham Forest Council. The Local Governing body, and their senior leadership teams, especially their designated safeguarding leads, will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)
- ensure this is reflected in their own policies and procedures
- supply information as requested by the three safeguarding partners
- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

POLICY STATEMENT

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of '**it could happen here**' and if there are no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

CONCERNS ABOUT A CHILD

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are:

We:

• Listen carefully

• Reassure the child that the concern will be taken seriously

• Reassure the child it was right to tell

• Do not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child.

• Avoid asking leading questions

• Explain what will happen next

• Alert the DSL or the DDSLs

• Use the school's electronic system (CPOMS) to report the incident

• Record up the conversation using the child's own words as far as possible, and note the date and time

• Sign and date your record, and pass to the DSL or DDSL

• In cases of serious harm, alert the police

Staff should expect to support social workers and other agencies following any referral.

Definitions of safeguarding, abuse, neglect and exploitation

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and well-being issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse and exploitation can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

All staff should be aware of indicators of abuse, neglect and exploitation. Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse. Staff should always be vigilant and raise any concerns with the DSL or DDSL.

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
- consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse, neglect or exploitation from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully;
- avoid asking leading questions;
- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

•a clear and comprehensive summary of the concern;

•details of how the concern was followed up and resolved;

•a note of any action taken, decisions reached and the outcome.

The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements or the sharing of images, staff are **reminded not to view or forward any illegal images** of a child but note what has been reported. Further guidance can be found in the Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by listening to the views of pupils, where possible. Where pupils are unable to share their opinions verbally, their usual method of communication will be used and recorded. Some pupils may prefer to build or draw their thoughts; these will be photographed using a school device and added to CPOMS. All images will be treated in line with the schools Data Protection Policy.

Information sharing:

Safeguarding information will often be special category personal data, and the school will comply with data protection law and have due regard to the Department for Education's statutory guidance - Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004.

guidance and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so such as were doing so is in order to promote a child's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via the United Learning Policies Portal. For further information about how the school processes pupil personal data, please see the privacy notice on the website.

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- undertaking a family help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan). Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing (in line with this policy).

Support before statutory intervention

Any child may benefit from support before statutory intervention including from universal services and community-based Early Help, or the targeted early help level of Family Help. All staff should be particularly alert to the potential need for early help for a child who:

• is disabled or has certain health conditions and has specific additional needs
• has special educational needs (whether or not they have a statutory Education, Health and Care plan)
• has a mental health need
• is a young carer
• is pregnant and or is a parent themselves
• has exhibited early signs of abusive, violent and/or harmful behaviours
• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
• is frequently missing/goes missing from education, home or care
• has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
• is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
• is at risk of being radicalised into terrorism
• has a parent or carer in custody, or is affected by parental offending
• is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
• is misusing alcohol and other drugs themselves
• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
• is a privately fostered child.

Children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

The following behaviours and indicators can be signs that children are at risk:

• drug taking and/or alcohol misuse
• unexplainable and/or persistent absences from education
• serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
• consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.

What staff should do if a child is suffering, or is likely to suffer from harm

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to Waltham Forest children's social care (and the Police if appropriate) is made in accordance with the Waltham Forest referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process, to enable a contextual approach (see further below re Contextual Safeguarding).

The school's local safeguarding partners are Waltham Forest, Northeast London Clinical Commissioning Group, Waltham Forest Chief of Police and the locally agreed safeguarding arrangements can be found via the Multi Agency Safeguarding Hub (MASH) Waltham Forest Council.

Where a pupil attends alternative provision, the school is responsible for ensuring relevant safeguarding information has been acquired prior to the commencement of the pupil placement. The school retains responsibility for the safeguarding of the pupil.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to MASH or call them directly on 0208 496 2310. Advice and support can also be sought from children's social care.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

What staff should do if a child goes Missing from Education/Children Absent from Education

Children missing/absent from education, particularly repeatedly and/or for prolonged periods, and children missing education (unexplainable and/or persistent absences from education) can

act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures. The school's procedures for unauthorised absence and for dealing with children who go missing/absent from education are to follow the attendance and punctuality policy. Further detail can also be found at Appendix 1 of this policy.

The school will report to Waltham Forest a student who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more.

Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended in statutory guidance that schools and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

Risk Assessments and Safety Plans

Assessing and managing safeguarding risks to/for children involves identifying vulnerabilities and risks, evaluating the likelihood and impact of harm, and putting proportionate measures in place via a written risk assessment or safety plan. Schools should ensure that a written risk assessment and/or safety plan is put in place promptly where there is a risk of significant harm, or where needs escalate beyond what can be safely managed without such a coordinated approach. Such situations may be identified by staff through (not exhaustive):

- Clear disclosures or evidence of harm;
- Escalating patterns of concern (e.g. behaviour, attendance, emotional wellbeing);
- Complex or cumulative vulnerabilities;
- Periods of transition or reintegration following crisis;
- Multi-agency involvement requiring coordinated risk management.

Examples of when such an approach may be needed include (not exhaustive):

- A pupil moving from low mood to expressing hopelessness, and then to suicidal thoughts/ideation;
- An incident/pattern of self-harm (assessing both the severity and frequency);
- Behaviour escalating from verbal conflict to intimidation or threats, and serious risk of physical violence to others;
- An incident/pattern of sexual harassment and/or sexual violence towards children and/or staff;
- A pupil becoming increasingly isolated or targeted, raising concerns about exploitation, bullying, or child-on-child abuse;
- Return to school following a significant incident or external intervention (e.g. hospitalisation, police involvement, social care intervention) where risks remain.

When the school identifies such a potential risk of significant harm, they will:

- Contact the United Learning Safeguarding Team for advice and support;
- Work with the family to create a written risk assessment management plan/safety plan;
- Ensure the plan is clear, proportionate and specific, identifying:
    - the nature of the risk,
    - known triggers or warning signs,
    - protective factors,
    - agreed strategies to reduce risk,
    - roles and responsibilities of staff,
    - actions to take if risk escalates;

- Use a local/reliable, sourced template document (schools are encouraged to use local resources, if possible, if they do not have access to an appropriate document there are template documents available via the United Learning Safeguarding Team);
- Seek the views of relevant agencies (with parental/carer permission), where appropriate;
- Ensure the child's voice is central to the plan, where appropriate;

- Share the plan with relevant staff on a need-to-know basis to ensure consistent implementation;
- Review the plan regularly, with frequency determined by the level of risk, and update it dynamically as circumstances change.

Oversight of high-risk plans should sit with the **DSL/DDSL/SMHL**, with senior leaders assured that plans are understood, implemented consistently and effective in reducing risk.

What staff should do if they have concerns about another staff member (including supply staff, volunteers and contractors)

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Head. Where there are concerns/allegations about the Head, this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors).

What staff should do if they have concerns about safeguarding practices in the school

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found on the school's website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARRASSMENT)

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between children;
- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse;
- The non-consensual sharing of indecent images*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below);
- 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;
- 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); and
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.
Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. The school takes a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.
It is recognised that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

As such, if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse is preventable. The school takes the following steps to minimise the risk of child-on-child abuse. Child on Child abuse can and will occur on any site even with the most robust policies and support processes. It is important to develop appropriate strategies to proactively prevent Child on Child abuse. This school has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. There is

a strong and positive PHSCE/SMSC (spiritual, moral, social, and cultural development) curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. The school makes sure that 'support and report' signposting is available to young people. Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff will consider each issue and each individual in their own right before taking action. Young people are part of changing their circumstances and, through school council and pupil voice for example, we encourage young people to support changes and develop 'rules of acceptable behaviour'. We involve pupils in the positive ethos in school; one where all young people understand the boundaries of behaviour before it becomes abusive

Consensual image sharing, especially between older children of the same age, may require a different response. Whilst not abusive, children still need to know it is illegal, whilst non-consensual sharing is illegal and abusive.

The school's approach to pupil's sharing nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery) is if a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the DSL, or an DDSL, as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy, or print the youth produced sexual imagery. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate. Further guidance can be found in the UKCIS Sharing nudes and semi-nudes: advice for education settings guidance.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies in the first instance:

Harmful Sexual Behaviour can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies **to behaviour occurring online, face-to-face, or both.** HSB should always be considered within a child protection context.

For detailed information on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole school or college approach to preventing child-on-child sexual violence and sexual harassment and more detailed advice on responding to reports see the Department for Education's statutory

guidance: ***Keeping Children Safe in Education (2026), Part 5 – Child-on-child sexual violence and sexual harassment***

Responding to a report of HSB, sexual harassment and/or sexual violence

The school's initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff are trained to manage a report. Effective safeguarding practice includes:

• if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)

• careful handling and management of reports that include an online element, including an awareness of guidance on searching screening and confiscation and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. **Staff should not view or forward illegal images of a child.** The above advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

• not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to

• recognising that a child is likely to disclose to someone they trust: this could be **anyone** within the school or college staff. Staff should recognise the significance of being chosen as a confidant and respond with empathy

• recognising that an initial disclosure may not reflect the full extent of abuse, and that trauma can impact memory meaning details may be affected

• keeping in mind that certain children may face additional barriers to disclosure especially for children with vulnerabilities related to disability, sex, ethnicity, or sexual orientation

• listening carefully to the child, reflecting back, using the child's language, avoiding judgement, being clear about boundaries and how the report will be progressed, and asking only open-ended questions - such as where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was

• considering the best way to record the report. Ideally, staff should wait until the end of the conversation to write a detailed summary, allowing the staff member to give the child their full attention. If notes are taken during the report, especially when a second staff member is present, care must be taken to remain engaged and not appear distracted. **It is essential a written record is made**

• record only what the child says, without interpretation or personal opinion. These notes may be used in statutory assessments and/or criminal investigations, and

• if the designated safeguarding lead (or a deputy), is not present during the report, they must be informed as soon as practically possible.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL will discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by a dedicated member of staff and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children.

The school will take advice from relevant local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as

possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and/ or the Police as appropriate.

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. Important considerations will include:

• the victim's wishes regarding how they want to proceed. Victims should be given as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered, balanced against the school or college's duty to protect others,
• the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB was displayed,
• the ages and developmental stages of the children involved,
• any power imbalance between the children such as differences in age, maturity, or social status. Consider if the victim has a disability or learning difficulty,
• whether the alleged incident was isolated or part of a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature),
• that sexual violence and sexual harassment can take place within intimate relationships between children,
• importance of understanding intrafamilial harm and support for siblings if needed,
• any ongoing risks to the victim, other children, adult students or school or college staff, and
• wider contextual concerns, including links to child sexual exploitation (CSE) or child criminal exploitation (CCE).

The DSL (or a deputy DSL) will make an immediate risk and needs assessment in respect of each child affected. (Where there has been a report of sexual harassment, the need for a risk and needs assessment should be considered on a case-by-case basis). The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school's approach.

The police will be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children's social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessments and ensure relevant protections and measures are in place for all children.

The school will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action, the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the school in meeting its Public Sector Equality Duty.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, TRAINEE TEACHERS, VOLUNTEERS AND CONTRACTORS

The school's procedures for managing concerns/ allegations against staff who are currently working in the school follows Department for Education statutory guidance and local safeguarding partners' arrangements and applies when staff (including supply staff, volunteers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside school, that might make them unsuitable to work with children "transferable risk". Advice can be sought from the LADO in assessing transferable risk).

Non-recent allegations

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to a school that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow).

All allegations should be investigated as a priority to avoid any delay.

Allegations that may meet the harms threshold

1. All allegations which appear to meet the above reporting criteria are to be **reported straight away to the 'case manager'** who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to Chair of the LGB and Head of Safeguarding. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with Chair of the LGB, Head of Safeguarding and LADO, and if appropriate, children's social care and the police.

2. **Welfare of the child:** Where the case manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.

3. **Investigating and supporting the person subject to the allegation:** Before contacting the LADO, schools should conduct <u>basic</u> enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
    - Was the individual in the school at the time of the allegation?
    - Could they have come into contact with the child?

    Schools should establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

5. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed with the Police/LADO. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is

an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

6. **Suspension:** The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.

7. **Support for the member of staff:** whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in KCSIE.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

9. **Further investigation:** where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken.

10. The case manager will discuss with the designated officer whether a referral to the **Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA)** should be made, noting the requirements of KCSIE. For instance:
    a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

    b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
        i. engaged in relevant conduct in relation to children and/or adults,
        ii. satisfied the harm test in relation to children and/or vulnerable adults; or
        iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

    c. In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.

11. Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

12. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be

made to the school's safeguarding procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designate officer and case manager should consider how future investigations of a similar 98 nature could be carried out without suspending the individual.

13. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

14. **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The school will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools should check the relevant provisions of KCSIE.

Information sharing

Staff should be mindful of the guidance set out in KCSIE in relation to sharing information between safeguarding partners during the course of the process of managing allegations against staff.

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

Allegation outcomes

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the

school's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

Supply teachers, trainee teachers and all contracted staff

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business.

Whilst the school is not the employer of supply teachers, they will ensure allegations are dealt with properly. (This includes not ceasing to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome). The school will usually take the lead in collecting the facts when an allegation is made and providing school relevant information required by the LADO as part of the referral process.

Governors

If an allegation is made against a governor, schools should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

Organisations or individuals using school premises

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

•being over friendly with children;

•having favourites;

•taking photographs of children on their mobile phone;

•engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

•humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Sharing/reporting a concern

Low-level concerns about a member of staff should be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the headteacher or principal. If someone is unclear who they should share their concern with, they should share it with the United Learning Safeguarding Lead, who is part of the Central Office Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the principal may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named the school will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair

disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

How should a low-level concern be responded to

The DSL/DDSL/Principal should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the school's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- where the DSL/DDSL/Principal is in any doubt whatsoever, they should seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important

for the DSL/DDSL/Principal to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the DSL/DDSL/Principal should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.

- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate;
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The DSL/DDSL/Principal should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

Recording concerns

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

All low-level concerns should be recorded in writing by the DSL/DDSL/Principal. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;
- all external conversations – for example, with the LADO/other external agencies;
- the rationale for decisions;
- any action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school should retain the record consistent with comply with United Learning's Data Protection policies. The school should retain all records of low-level concerns (including those which are subsequently deemed by the DSL/DDSL/Principal to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the DSL/DDSL/Principal and the individual they report to (e.g. Regional Director); and senior HR officer, and the individual they report to (e.g. Head of HR). The DSL/DDSL/Principal may store the central low level concerns file with his/her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

The school will refer to Part Four, Section Two of KCSIE for further advice and guidance.

STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The school's staff code of conduct can be found on the Staff Share Drive. The aim of the staff code of conduct is to provide clear guidance about behaviour and actions and responses to low level concerns in order not to place students or staff at risk of harm or of allegation of harm to a student.

SAFER RECRUITMENT

The school is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work unsupervised in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the school will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed, and the individual will be appropriately supervised. Please refer to the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

Full details of the school's safer recruitment procedures for checking the suitability of staff, members of the School LGB and Trustees of ULT and volunteers to work with children and young people is set out in

- United Learning / the School's Recruitment and Selection Policy;
- United Learning's Safeguarding Children – HR Procedural Guidance;
- United Learning's LGB Handbook; and
- United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.}.

The school's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in the School's Recruitment and Selection Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Courtney Thompson who is a member of the leadership team.

Rachel Noble, Rukmini Dasgupta, Felix Odutolu & Susan Tierney are the DDSLs and the person to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL's responsibility is to maintain an overview of safeguarding within the school (including online safety and understanding the filtering and monitoring systems and processes in place), to open channels of communication with local statutory agencies, to liaise closely with safeguarding partners (such as children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL (and DDSL) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the LGB to review and update the school's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse, who have a social worker, or who are receiving support through the Channel programme, and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL should be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements are to contact the DSL and/or DDSLs by email, and/or contact the Waltham Forest MASH Team for further advice or guidance.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

All Staff

All new staff will be provided with induction training that includes:

- Safeguarding and child protection, including online safety
- the child protection policy, including information about the identity and role of the DSL(s) and DDSLs
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education
- the staff code of conduct including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE* (Current edition/publication)
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE*.

Induction training usually takes place within seven (7) working days of staff commencing work. Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up-to-date versions of the Staff Student Relationship Letter and Acceptable Use Declaration. The staff code of conduct can be found on the Staff Share Drive.

Temporary staff and volunteers are provided with a volunteer starter pack from Cluster HR.

As part of the whole school safeguarding approach, all staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Confirmed via Microsoft Form online (Cluster HR) Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email.
- Understand key information contained in Part One of *KCSIE*. The school will ensure staff understanding by providing training time to support staff with this.
- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via, for example, emails, e-bulletins and staff meetings & weekly staff briefings.

DSL(s) - Designated Safeguarding Lead (s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge skills and authority required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the Waltham Forest Safeguarding Team/LADO Teach approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSLs are trained to the same level as the DSL.

To ensure continuity of safeguarding responsibilities, the school implements robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. When the DSL is unavailable, any member of the safeguarding team and DDSL is whom concerns or queries are to be directed to.

*Whilst external catering and maintenance staff are not technically United Learning/school employees (and therefore safeguarding training is not the responsibility of the school), they should receive an appropriate safeguarding induction to ensure they are aware of and understand all the school's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

Governors and Trustees

All governors and trustees must receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated.

All governors (and proprietors) should be aware of their obligations under the Human Rights Act 1998 and, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christie Spurling is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. David Booth is the LGB lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. They are a member of the School's LGB and/or a member of ULT.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The DSL and LGB review the safeguarding policy against annual updates, in conjunction with United Learning. The school draws on the expertise of staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Opportunities to teach safeguarding

The local governing body and United Learning Trust ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and Health Education and PSHE.

The school provides 'Preventative Education' in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These will be underpinned by the school/college's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This programme will tackle, at an age-appropriate stage, issues such as:

• supporting children to develop the skills that form the building blocks of all positive relationships

• healthy and respectful relationships

• boundaries, consent and kindness in relationships

• stereotyping, prejudice and equality

• body confidence and self-esteem

• how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour

• the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support,

• what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and

• understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

The school recognises the additional risks that children with SEND face online and works with the Head of IT to ensure that additional support and measures are in place to support these children. Online safety is an integral part of the school's Computing curriculum for all pupils and is taught in an age-appropriate way relevant to pupils' lives. It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole school approach is taken to online safety in the Online/E-Safety Policy that empowers the school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

It is also embedded in PSHE and Relationships and Sex Education. Pupils will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns.

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online a review, of their effectiveness is carried out at least once every academic year. The review is carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. This include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks. The school ensures that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The school considers the number of and age range of their children, 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. The school's systems are filtered and monitored by LGFL. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The leadership team and relevant staff must have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. Staff should raise all concerns to the Principal.

The school will communicate with parents and carers to reinforce the importance of children being safe online and to help them understand what systems schools and colleges use to filter and monitor online use. It will be especially important for the school to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Further detail of the school's approach to online safety can be found in school's Online E-Safety Policy which also includes detail on the use of mobile technology in school (and accessing 3G, 4G and 5G technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the school's systems.

Looked after children (and previously looked after children)

Looked after children (and previously looked after children) are a particularly vulnerable group. The school will ensure that prompt action is taken when necessary to safeguard these children and the local governing body and United Learning Trust ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Courtney Thompson is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The school ensures that the designated member of staff receives appropriate training to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

Children who need a social worker (Child in Need and Child Protection Plans)

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are

known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils, and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Young carers

Schools should be alert to 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.

Children requiring mental health support

The school has an important role to play in supporting the mental health and wellbeing of pupils.

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Whilst education staff are not expected to diagnose or treat mental health problems; they still have an important role to play. Specifically, they can support the fulfilment of four key roles:

• promoting good mental wellbeing and preventing the onset of mental illness;

• observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one;

• ensuring early targeted support is provided, and

• liaison with/referral to specialist services where needed.

Schools should use the United Learning's Tiered Model for a Mentally Healthy School (available to schools on the United Learning Hub) to support their approach to mental health. This tiered model has been developed by United Learning to support school Senior Mental Health Leads (SMHLs) and those with responsibility for pupil mental health and wellbeing (e.g. DSL/DDSL) to:

- Better understand what they are accountable for at school level to ensure pupils' mental health and wellbeing, and what needs to be in place to build a mentally healthy school with a strong sense of belonging;
- Know how to accurately categorise children's mental health across a continuum to identify appropriate interventions in school (e.g. a safety plan) or relevant external support;
- Ensure that risk assessments and safety plans are aligned with the graduated approach, moving from universal to targeted and specialist support as need increases;
- Identify when concerns meet the threshold for more intensive intervention or multi-agency involvement, including where safeguarding risk is present.

School staff should record any concerns related to pupil's mental health on CPOMS.

Safeguarding children with medical conditions

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in a school or college, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

Children who are questioning their gender

It is not for schools and colleges to initiate any action in this area; this is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding.

Schools and colleges should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools and colleges should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Schools should not initiate any action regarding social transition. Where a child or their parent has made a request. Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers.

When considering any request for support with social transition, the schools will ensure that their decision-making process is documented and records are kept.

In making decisions about supporting social transition, the school must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.

Decisions will be in line with the following principles, and the school will ensure that their decision-making process is documented and records are kept:

- Schools and colleges have statutory duties to safeguard and promote the welfare of all children;
- Parents and carers should be actively involved and their views treated with importance;
- Accommodating social transition is an active intervention so schools should take a very careful approach;
- Schools should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition;

In all cases the school will refer to the guidance set out in Keeping Children Safe in Education.

Mobile Phone Policy

The school is a mobile phone-free environment by default; anything other than this should be by exception only.

Restrictive interventions, including the use of reasonable force

There are times when the use of restrictive interventions will be lawful and necessary; for example, to keep individuals and the wider school community safe. The school is aware of statutory guidance from the Department for Education issued under section 93A of the Education and Inspections Act 2006 and must have regard to this in relation to recording and reporting each significant incident involving the use of force by members of staff and of non-statutory guidance outlined in 'Restrictive interventions, including the use of reasonable force, in schools' (DfE, current version).

The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The school will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty (where relevant). Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The school will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual safety plan for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Arrangements for Visiting Speakers

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to students is to ensure that they can

critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Use of school premises for non-school activities

Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Alternative provision

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will ensure it is satisfied that the placement meets the pupil's needs.

The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written

confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will know where a child is based during school hours and will have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They will regularly review the alternative provision placements they make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the school's early years or provision of care of students under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the school's Recruitment and Selection Policy.

The school records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Staff use of mobile phones and cameras (and other relevant devices)

The school's policy on the use of mobile phones and cameras (and other relevant devices) in the setting can be found in the School's Acceptable Use Policy. Staff are not permitted to use their personal mobile devices or cameras in school. Staff who wish to use or take photographs or video of students (whether on a personal or school device) must first speak with the Head to obtain their approval before using or taking any image of a student. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Principal. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Principal.

All EYFS staff are also referred to United Learning Online Safety Policy (available on the United Learning Hub).

DSL for the EYFS

The DSL in the early years settings is Courtney Thompson.

[Duty to notify/report to Ofsted a serious childcare incident]

The school will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware (or ought reasonably to have become aware) of it.

The school will notify Ofsted within 14 days 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).

The school will notify Ofsted of any serious accident, illness or injury to, or death of, any child while in their care, and of the action taken. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence. Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on any advice from those agencies.

Absences

The nursery will follow up on absences in a timely manner. If a child is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts. The nursery will consider patterns and trends in a child's absences and their personal circumstances and use their professional judgement when deciding if their absence should be considered as prolonged. Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

The nursery has an attendance policy that they share with parents and/or carers. This includes expectations for reporting child absences and the actions the nursery will take if a child is absent without notification or for a prolonged period of time, for example: implementing the setting's safeguarding procedures, following up with the parents and/or carers and contacting emergency contacts if parents and/or carers are not contactable.

Where possible, settings should hold more than two emergency contact numbers for each child.

Waiver from Disqualification

In certain circumstances, a person who is disqualified from registration by Ofsted may apply to Ofsted for a waiver of disqualification unless, for example, they are barred from working with children.

Safe Working Practice

Children's privacy is considered and balanced with safeguarding and support needs when changing nappies and toileting.

Police attendance on school site (Statutory Guidance – PACE Code C 2019) Students may only be interviewed at their place of education in exceptional circumstances and only when the principal or their nominee agrees. Every effort will be made to notify the parent(s) or other person responsible for the student's welfare and the appropriate adult, if this is a different person, that the police want to interview the student and reasonable time will be allowed to enable the appropriate adult to be present at the interview. If awaiting the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the educational establishment, the principal or their nominee will act as the appropriate adult for the purposes of the interview.

APPENDIX 1 –FURTHER INFORMATION

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another, and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

This appendix contains important additional information about specific forms of abuse and safeguarding issues.

Physical abuse: a form of abuse which 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: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include 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, 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. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education and **all** staff should be aware of it and of their school's policy and procedures for dealing with it.

Neglect: 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

• appear with unexplained gifts, money or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation

• associate with other children involved in exploitation

• suffer from changes in emotional well-being

• misuse alcohol and other drugs

• go missing for periods of time or regularly come home late, and

• regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

• have older boyfriends or girlfriends; and

• suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: Child sexual exploitation: guide for practitioners.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line." This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

• go missing (from school or home) and are subsequently found in areas away from their home

• have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)

• are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection

• are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity

• owe a ‘debt bond’ to their exploiters, and

• have their bank accounts used to facilitate drug dealing.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college’s unauthorised absence procedures and children missing education procedures.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

• unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded

• ‘Denial of Service’ (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory

definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse.' Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse.1 This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Homelessness

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

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead

agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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 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.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in serious violence. These may include:

• increased absence from school or college

• a change in friendships or relationships with older individuals or groups

• a significant decline in educational performance

• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and

• unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

• being male

• having been suspended, spent time in Alternative Provision or permanently excluded from school, and

• having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places.

Honour or faith-based abuse (including female genital mutilation and forced marriage)

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

FGM mandatory reporting duty for teachers

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.157 Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage

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

Whittingham Primary Academy
The best in everyone™

SAFEGUARDING

At Whittingham Primary







Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Deputy Designated Safeguarding Lead
Miss Thompson	Miss Dasgupta	Miss Noble	Mr Odutolu	Miss Tierney

APPENDIX 3 – Safeguarding Training Log (Template)

Safeguarding Training Log – Academic Year [●INSERT]		
Attendees	**Type of training provided**	**Date undertaken**
Principal/Head		
DSL		
DDSL		
Senior Leadership Team		
Pastoral Leads		
Whole School		
e-safety Lead		
P.E. staff		
Medical Needs Officer		
Paediatric First Aiders		
Health & Safety /COSH		
EVC		
Chair of Governors of LGB		
Nominated Safeguarding Governor of LGB		
Local Governing Body (whole board)		
Agency Staff /Peripatetic		
Volunteers		
Contractors		
Other		