Policy: Child Protection and Safeguarding Policy – Dunalley Nursery, Pre-school and School

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Updated by: Headteacher

Safeguarding is embedded within every aspect of school life at Dunalley Nursery, Pre-school and School. We are committed to creating a strong safeguarding culture where the welfare of every child is paramount, safeguarding is everyone's responsibility and every member of staff maintains an attitude of *"it could happen here."* Staff are expected to exercise professional curiosity, recognise and respond promptly to emerging concerns, and always act in the best interests of children.

We welcome every child into a safe, inclusive and nurturing environment where they are supported to learn, thrive and achieve. Safeguarding underpins every aspect of our work and is central to all decision-making. All school policies are developed with children's safety and welfare at their core and should be read as part of our wider safeguarding framework. In particular, this policy should be read alongside the Acceptable Use, Anti-bullying, Staff Code of Conduct, Online Safety, Child-on-child Abuse, Positive Behaviour and Whistleblowing policies.

Acronyms
AI – Artificial Intelligence
CME – Children Missing Education
CCE – Child Criminal Exploitation
CSE – Child Sexual Exploitation
DfE – Department for Education
DSL – Designated safeguarding lead
FGM – Female genital mutilation
FM – Forced marriage
GSCP – Gloucestershire Safeguarding Children Partnership
HSB – Harmful Sexual Behaviour
KCSIE – Keeping Children Safe in Education
LA – Local authority
LADO – Local authority designated officer
MARF – Multi agency referral form
MASH – Multi agency safeguarding hub
RSHE – Relationships, Sex and Health Education
TAC – Team around the child
TAF – Team around the family

In an emergency, out of hours, or if a child is believed to be at risk of harm, or has suffered significant harm, you should call the police via 999.

You should contact the Multi-Agency Safeguarding Hub (MASH) for concerns involving children on:

Children's Services Front Door team (9am-5pm): 01452 426565

Emergency Duty Team (from 5pm to 9am): 01452 614194

More information can be found in Section 7 of this policy.

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1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023) and the Maintained schools governance guide, and other relevant statutory guidance. It reflects the safeguarding arrangements established by the Gloucestershire Safeguarding Children Partnership and applies to all adults working in or on behalf of the school.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive

action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations')
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

Dunalley also follows locally agreed multi-agency procedure that have been put in place by the school's three safeguarding partners: Gloucestershire Safeguarding Children Partnership | Gloucestershire Safeguarding Children's Partnership.

Safeguarding is a dynamic area of practice. The school recognises that risks to children continue to evolve, particularly in relation to technology, online behaviour, exploitation and contextual safeguarding. This policy will therefore be reviewed annually and updated whenever statutory guidance changes or local safeguarding arrangements require amendment.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Children may experience abuse, neglect, and exploitation within their families, their communities, online or through their relationships with peers and adults. Abuse rarely occurs in isolation, and staff should be alert to multiple and overlapping safeguarding concerns.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

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

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Contextual safeguarding recognises that children may experience significant harm outside their families, including within peer groups, schools, neighbourhoods, transport networks and online environments. Staff will consider these wider contexts when assessing safeguarding concerns.

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

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

Professional curiosity is the capacity and responsibility to explore and understand what is happening within a child's life rather than accepting information at face value. It requires staff to notice patterns, ask appropriate questions, respectfully challenge explanations where necessary, and share concerns promptly with safeguarding leads.

Emerging technology includes generative artificial intelligence, synthetic media, deepfakes and other rapidly developing technologies which may be used to facilitate abuse, bullying, grooming, fraud, exploitation or the creation of harmful content.

4. Equality statement

Some children face additional vulnerabilities or barriers that may increase their risk of abuse, neglect, or exploitation, both online and offline. These barriers may affect how abuse is recognised, responded to or disclosed.

We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Have experienced trauma or adverse childhood experiences
- Are affected by parental imprisonment

5. Roles and responsibilities

Safeguarding is embedded within every aspect of school life at Dunalley Nursery, Pre-school and School and is everyone's responsibility. We are committed to fostering a strong safeguarding culture in which children's welfare is paramount, safeguarding informs every aspect of school life and all staff maintain an attitude of *"it could happen here."* Staff are expected to exercise professional curiosity, recognise emerging concerns promptly and always act in the best interests of children.

This policy applies to all staff, governors, volunteers, supply staff, contractors and visitors. It is consistent with the arrangements established by the Gloucestershire Safeguarding Children Partnership and applies equally to extended school provision, educational visits and off-site activities.

The school plays a crucial role in preventative education. This is delivered through a whole-school approach to preparing pupils for life in modern Britain and promoting a culture in which discrimination, abuse, harassment and violence are never tolerated. This is underpinned by our:

- Behaviour Policy
- Pastoral support systems
- Relationships, Sex and Health Education (RSHE) curriculum, which is inclusive and delivered regularly, enabling pupils to develop healthy relationships, recognise abuse, understand consent, challenge prejudice and know how to seek help.

5.1 All staff

Every member of staff has a responsibility to safeguard and promote the welfare of children. Staff understand that safeguarding concerns should never be dismissed because they appear minor in isolation and that abuse, neglect and exploitation frequently present through a pattern of concerns over time.

All staff will:

- Read and understand Part One of Keeping Children Safe in Education (2026) in full and review this guidance at least annually. Staff will also be aware of the role and responsibilities of the Designated Safeguarding Lead, as set out in Annex B of KCSIE.
- Sign a declaration confirming they have read the statutory guidance.
- Reinforce online safety when communicating with pupils and families.
- Provide a safe, inclusive environment in which children feel able to speak about worries or concerns.
- Maintain an attitude of *"it could happen here"*.
- Exercise professional curiosity by noticing changes in behaviour, presentation, attendance, relationships and wellbeing, asking appropriate questions where necessary and reporting concerns promptly.
- Understand that persistent absence, repeated lateness and children missing education may indicate safeguarding concerns.
- Recognise that safeguarding includes protecting children from risks associated with technology, including online abuse, grooming, coercion, exploitation, fraud, deepfakes, synthetic media and the misuse of generative artificial intelligence.
- Understand that abuse, neglect and exploitation can occur within families, peer groups, the wider community and online.
- Share concerns promptly, recognising that early information sharing may prevent children experiencing further harm.

All new staff, volunteers and regular visitors will receive safeguarding induction before working unsupervised with children. This will include:

- this safeguarding policy;
- the Staff Code of Conduct;
- the Behaviour Policy;
- whistleblowing procedures;
- safeguarding responses to children missing or absent from education;
- the identity and role of the DSL and deputy DSLs;
- procedures for reporting concerns;
- expectations regarding professional curiosity;
- CPOMS recording procedures;
- online safety;

- filtering and monitoring arrangements.

All staff will be aware of:

- the school's safeguarding systems and procedures;
- local early help arrangements;
- referral processes;
- indicators of abuse, neglect and exploitation;
- contextual safeguarding;
- child-on-child abuse;
- harmful sexual behaviour;
- domestic abuse;
- criminal exploitation;
- sexual exploitation;
- county lines;
- radicalisation;
- serious violence;
- emerging safeguarding risks associated with technology;
- cumulative risk and multiple vulnerability.

Volunteers, supply staff and contractors are expected to follow the same safeguarding procedures and report any concern immediately.

5.2 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is a member of the senior leadership team and takes lead responsibility for child protection and safeguarding across the school.

The DSL is responsible for ensuring safeguarding concerns are identified, recorded, monitored and acted upon promptly. They maintain strategic oversight of safeguarding practice across the school, ensuring that safeguarding remains responsive to local need, emerging national guidance and evolving risks.

The DSL will:

- promote educational outcomes for children who have experienced, or are experiencing, safeguarding or welfare concerns, including understanding the impact these may have on their attendance, engagement, progress and attainment;

- work with relevant leaders to monitor and review the effectiveness of the school's filtering and monitoring arrangements, including consideration of incidents, alerts, emerging risks and any actions required;

- contribute to the annual review of filtering and monitoring arrangements and the safeguarding assurance provided to the Governing Board;
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- ensure that appropriate safeguarding arrangements are in place for school activities that take place outside normal school hours or term time, including appropriate DSL availability and arrangements for responding to safeguarding concerns.
- ensure safeguarding records are accurate, comprehensive, contemporaneous and securely maintained;
- review safeguarding records regularly to identify patterns, cumulative concerns and emerging risks;
- promote professional curiosity across the school;
- oversee safeguarding arrangements relating to attendance, contextual safeguarding and exploitation;
- ensure filtering and monitoring arrangements remain effective;
- maintain oversight of risks associated with online activity and emerging technologies;
- work closely with partner agencies to secure timely support for children;
- provide advice, guidance and challenge to staff.

Deputy DSLs will:

- receive the same level of safeguarding training as the DSL;
- have sufficient authority, knowledge and capacity to fulfil the role;
- provide safeguarding leadership whenever the DSL is unavailable.

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

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

The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

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

5.2 The Headteacher

The Headteacher has overall responsibility for ensuring that safeguarding and promoting the welfare of children remain central to the school's strategic leadership, culture and day-to-day practice. The Headteacher is responsible for ensuring that safeguarding is embedded across all aspects of school life and that the school fulfils its statutory safeguarding duties.

The Headteacher will:

- promote and sustain a strong whole-school safeguarding culture in which children's welfare is paramount and safeguarding is everyone's responsibility;
- ensure safeguarding is embedded within strategic planning, school improvement, curriculum development and decision-making;
- ensure that safeguarding policies and procedures are implemented consistently and reviewed regularly to reflect statutory guidance and emerging safeguarding risks;
- ensure that staff receive high-quality safeguarding training, supervision and support appropriate to their role;
- ensure safeguarding concerns are identified, recorded, acted upon promptly and monitored effectively;
- promote a culture of professional curiosity, early intervention and effective multi-agency working;
- ensure appropriate staffing, safeguarding leadership and safer recruitment arrangements are maintained;
- oversee the safe use of technology, including effective filtering and monitoring arrangements, to safeguard children online.

The Headteacher is also responsible for:

- ensuring that all staff (including temporary staff), volunteers and regular visitors receive appropriate safeguarding induction, including:
- this Child Protection and Safeguarding Policy;
- the Staff Code of Conduct;
- safeguarding reporting procedures;
- the identity and responsibilities of the Designated Safeguarding Lead (DSL) and deputy DSLs;

- the school's safeguarding systems, including CPOMS;
- ensuring that all staff understand and follow the procedures contained within this policy, particularly those relating to identifying, recording and reporting safeguarding concerns and making referrals where appropriate;
- communicating this policy to parents and carers when their child joins the school and ensuring it remains available via the school website;
- acting as the case manager for allegations of abuse made against members of staff or volunteers, where appropriate (see appendix 3);
- managing all reported low-level concerns in accordance with statutory guidance;
- ensuring statutory staffing ratios are maintained where applicable;
- ensuring that every child in the Early Years Foundation Stage is assigned a key person;
- overseeing the safe use of technology, including mobile phones, cameras and other digital devices, in accordance with the school's safeguarding procedures.

5.3 The Governing Board

The Governing Board provides strategic leadership and oversight of safeguarding, ensuring that the welfare of children remains paramount and that the school fulfils its statutory safeguarding responsibilities. Governors recognise that safeguarding is fundamental to the school's effectiveness and play a vital role in providing support, challenge and accountability.

In carrying out this role, the Governing Board will:

- champion a strong whole-school safeguarding culture in which safeguarding and child protection underpin all aspects of school life;
- seek assurance that safeguarding arrangements are effective, consistently implemented and responsive to local and national safeguarding priorities;
- provide appropriate support and constructive challenge to school leaders regarding safeguarding practice and outcomes;
- ensure safeguarding remains central to strategic planning, school improvement and policy development;
- monitor safeguarding themes, trends and patterns, including attendance, persistent absence, suspensions, exclusions, behaviour, online safety, child-on-child abuse and safeguarding referrals, to identify areas requiring strategic action;
- ensure that the Designated Safeguarding Lead (DSL) has the authority, capacity, time, funding, training and resources necessary to fulfil their statutory responsibilities effectively;
- ensure filtering and monitoring arrangements are effective, proportionate, regularly reviewed and aligned with the Department for Education's filtering and monitoring standards.

In fulfilling its statutory responsibilities, the Governing Board will:

- facilitate a whole-school approach to safeguarding, ensuring safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of policy development, decision-making and school improvement;
- review and approve this policy annually, ensuring it remains compliant with current legislation and statutory guidance, and hold the Headteacher to account for its effective implementation;
- fulfil its responsibilities under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and local multi-agency safeguarding arrangements;
- appoint a Safeguarding Governor to support and monitor safeguarding arrangements on behalf of the Governing Board;
- ensure all staff receive safeguarding and child protection training, including online safety, which is regularly updated in accordance with statutory guidance and local safeguarding partner advice;
- ensure the school has appropriate filtering and monitoring systems in place and review their effectiveness regularly.

The Governing Board will receive appropriate safeguarding assurance throughout the year and undertake an annual review of the effectiveness of safeguarding arrangements. This will include consideration of safeguarding training, DSL capacity, vulnerable children, child-on-child abuse, low-level concerns, safer recruitment, filtering and monitoring, attendance and multi-agency working. The review will identify any actions required to strengthen safeguarding practice.

The Governing Board will also ensure that:

- school leaders and staff understand the school's filtering and monitoring arrangements and their responsibilities in relation to them;
- the school's filtering and monitoring arrangements reflect the DfE's filtering and monitoring standards;
- online safety is embedded as a running and interrelated theme within the school's whole-school approach to safeguarding;
- the DSL has lead responsibility for safeguarding, including online safety, and has a thorough understanding of the school's filtering and monitoring systems and processes;
- effective procedures are in place for managing safeguarding concerns, including allegations and low-level concerns relating to staff, supply staff, volunteers and contractors (see Appendix 3);
- this policy reflects that children with SEND and children with certain medical or physical health conditions may face additional barriers to recognising, reporting or disclosing abuse and neglect.

Where another organisation provides services or activities on the school site, regardless of whether the children attending are on the school's roll, the Governing Board will seek assurance that:

- appropriate safeguarding and child protection policies and procedures are in place;

- effective arrangements exist for sharing safeguarding information with the school where appropriate;
- safeguarding requirements form part of any agreement to use the school premises, with appropriate action taken if these requirements are not met.

The Chair of Governors will act as the case manager where an allegation of abuse is made against the Headteacher, where appropriate (see Appendix 3).

All governors will read Keeping Children Safe in Education in its entirety and undertake safeguarding training appropriate to their role. Governors will receive regular safeguarding updates to ensure they remain informed about changes to statutory guidance, local safeguarding arrangements and emerging safeguarding risks.

Further information about governor safeguarding training and support is set out in Section 15 of this policy.

6. Confidentiality

The school recognises that appropriate information sharing is essential to effective safeguarding. Whilst the school respects the importance of confidentiality and data protection, the welfare of the child is always paramount. Staff will share information lawfully, proportionately and without unnecessary delay where doing so is necessary to safeguard or promote the welfare of a child.

The school's approach to confidentiality and information sharing reflects statutory safeguarding guidance and acknowledges that:

- timely information sharing is essential to effective safeguarding and child protection;
- fears about sharing information must never stand in the way of promoting the welfare of, or protecting the safety of, a child;
- the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 do not prevent, or limit, the sharing of information where this is necessary to keep children safe;
- decisions about sharing safeguarding information should always be based on professional judgement, taking account of the child's best interests, the nature and level of risk, and the need to protect children from harm;
- where staff need to share special category personal data for safeguarding purposes, they will do so in accordance with the UK GDPR and the Data Protection Act 2018. The safeguarding of children and individuals at risk provides an appropriate legal basis for sharing information without consent where this is necessary to protect a child;
- staff should never promise a child that they will keep information relating to abuse, neglect or exploitation secret, as this may not be in the child's best interests and could prevent appropriate action being taken to protect them;
- where appropriate, decisions to share, or not to share, safeguarding information should be recorded, together with the rationale for the decision, in accordance with the school's record-keeping procedures;

- if staff are ever uncertain about whether information should be shared, they must seek advice from the Designated Safeguarding Lead (DSL) or a deputy DSL without delay.

Reports of sexual violence or sexual harassment

Where a child reports sexual violence or sexual harassment, the school will carefully consider the wishes of the victim whilst ensuring that safeguarding responsibilities remain paramount.

If a victim asks the school not to share information:

- there is no automatic expectation that confidentiality can be maintained. Even where a victim does not consent to information being shared, staff may lawfully share information where there is another lawful basis to do so under the UK GDPR and Data Protection Act 2018;
- the DSL will carefully balance the victim's wishes against the school's duty to safeguard the victim and other children;
- in reaching a decision, the DSL will consider that:
    - parents or carers should normally be informed unless doing so would place the child at greater risk of harm;
    - where a child is suffering, or is likely to suffer, significant harm, a referral should be made to Children's Social Care without delay;
    - rape, assault by penetration and sexual assault are criminal offences. Reports of these offences should normally be referred to the police. Whilst the age of criminal responsibility is 10 years, the starting principle remains that reports should be referred to the police even where the alleged perpetrator is under the age of 10, who will work with partner agencies to determine the most appropriate response.

Protecting confidentiality

Where reports of sexual violence or sexual harassment are being managed, all staff will:

- recognise the importance of protecting the privacy and dignity of all children involved;
- do everything reasonably possible to protect the anonymity of victims, alleged perpetrators and witnesses, including carefully considering who needs to know about the report;
- understand the importance of witness support and the criminal justice process where relevant;
- consider the potential impact of social media, online platforms and emerging technologies in spreading rumours, exposing identities or causing further harm.

The school has regard to the Department for Education's information sharing advice for safeguarding practitioners guidance, including the Seven Golden Rules for Information Sharing, to support staff in making appropriate decisions about sharing safeguarding information.

Further guidance relating to confidentiality is provided within section 15 (Record Keeping) and appendix 3 (Allegations and Low-Level Concerns).

7. Recognising abuse and taking action

All staff are expected to recognise, respond to and report all forms of abuse, neglect, exploitation and safeguarding concerns. Staff should be alert to the need for early help, maintain an attitude of "it could happen here" and exercise professional curiosity where a child's presentation, behaviour, attendance or circumstances give cause for concern.

Staff should recognise that safeguarding concerns rarely occur in isolation. A pattern of seemingly low-level concerns may indicate a child is at increasing risk of harm and should always be considered cumulatively.

All staff are expected to be alert to the potential need for early help for a child who:

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

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

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

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

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm. If you consider a child to be in immediate danger, you must call the police on 999.

Anyone can make a referral. Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

- During office hours the **Gloucestershire Children and Families Front Door Service** can be contacted on **01452 426565** (Monday to Friday 9am to 5pm). Use this number if you have concerns but do not believe that a child is at immediate risk of harm.
- If the issue cannot safely wait until the next working day, you must contact the **Emergency Duty Team** on **01452 614758** and provide as much information as possible.
- If a child is already open to social care and has a social worker, contact them directly with concerns. The DSL and Deputies can access the name and contact details of the social worker on CPOMs.
- In Gloucestershire, referrals to Early Help and Social Care are submitted via and online Multi-Agency Request Form (MARF) which is available via: Report a child protection concern | Gloucestershire County Council.
- A direct link is available here: Request support from Children's social care and Early Help – Gloucestershire Forms. You need to register to sign in to the facility.
- In non-emergency situations advice can be sought from the **Professional Advice Line – 01452 427070**. This facility is available Monday to Friday, 8.30am-3.30pm and offers support with:
    - Understanding thresholds for Early Help and Social Care where a decision to refer is unclear
    - Talking through concerns to determine if a MARF is needed
    - Guidance on completing the MARFs
    - Advice on supporting families under My Plans including signposting to services and support and advice on best approaches to addressing concerns

If the advice line is busy when you ring you can leave a message, and they will get back to you as soon as possible.

7.2 If a child makes a disclosure to you

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

- Listen carefully, take the child seriously and reassure them that they have done the right thing by speaking to you. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

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

None of these factors should prevent staff from exercising professional curiosity, sharing concerns promptly and seeking advice from the DSL where they remain worried about a child.

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

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

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

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

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is at risk of FGM, or suspects that FGM has been carried out, must speak to the DSL immediately and follow the school's safeguarding procedures.

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

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

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

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

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

Early Help, Family Help and Targeted Support

Dunalley recognises the importance of providing help and support to children and families as soon as needs or concerns emerge. Early support can prevent difficulties from escalating and help families build on their strengths and access the right support at the right time.

In line with *Working Together to Safeguard Children 2026* and *Keeping Children Safe in Education 2026*, support may include universal services and community-based early help and, where more targeted or coordinated support is required, Family Help. Family Help includes targeted early help and support provided under section 17 of the Children Act 1989.

Early help and support should be considered for any child or family who may benefit from additional support. Staff should be particularly alert to children whose circumstances may make them more vulnerable and should discuss emerging concerns with the DSL or a Deputy DSL.

Dunalley has a full-time Child and Family Support Worker who provides Early Help who can be contacted via 01242 512391 or familysupport@dunalley.gloucs.sch.uk.

Gloucestershire also has a range of advice, guidance and support services which support families and the practitioners who are supporting them, alongside a range of targeted services where more help is needed. More information can be found here: Early Help and Targeted Support | Gloucestershire County Council and Glosfamilies Directory | Advice, Support and Early Help Services.

Dunalley safeguarding leads will generally lead on requesting Gloucestershire Early Help. The Early Help Request for Support Form is available here: Glosfamilies Directory | Early Help Request for Support

The DSL or a Deputy DSL will maintain appropriate oversight of children receiving additional safeguarding-related support. The effectiveness of support will be kept under review and, where concerns are not improving, needs increase or there is concern that a child is suffering or is likely to suffer significant harm, the school will consider and make a referral to local authority children's social care in accordance with the procedures set out in this policy.

Referral

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

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

Referrals should be made without delay, and staff should not assume that somebody else has taken action.

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

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

Gloucestershire's Escalation of Professional Concerns Guidance can be found here: escalation-of-professional-concerns-guidance-january-2021.pdf.

7.5 If you have concerns about extremism

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

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

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

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

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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

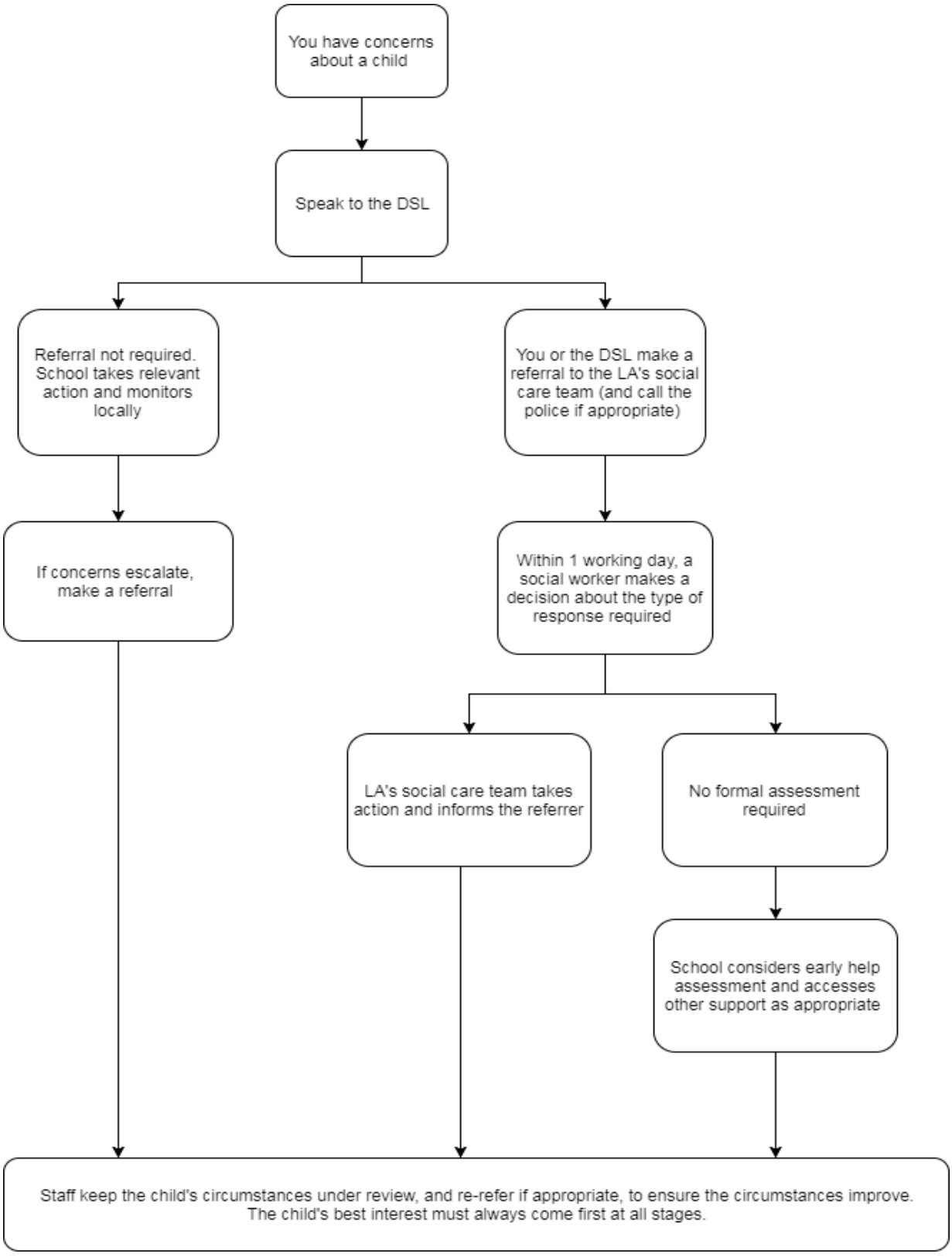
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

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

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

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)


You have concerns about a child
Speak to the DSL
Referral not required. School takes relevant action and monitors locally
You or the DSL make a referral to the LA's social care team (and call the police if appropriate)
If concerns escalate, make a referral
Within 1 working day, a social worker makes a decision about the type of response required
LA's social care team takes action and informs the referrer
No formal assessment required
School considers early help assessment and accesses other support as appropriate
Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve. The child's best interest must always come first at all stages.

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

All staff must understand that concerns about adults working with children, including low-level concerns, should be shared promptly and never ignored, even where they appear minor in isolation.

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

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

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

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

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

7.8 Allegations of abuse made against other pupils

We recognise that children can abuse other children and that child-on-child abuse can take many forms. Such abuse can occur both inside and outside school, face to face and online. All incidents will be taken seriously and managed in accordance with this policy.

Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

All child-on-child abuse is unacceptable and will be taken seriously. We recognise that child-on-child abuse may be symptom of unmet need or abuse experienced by the child displaying the behaviour. Both the victim and the alleged perpetrator may therefore require safeguarding support.

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

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

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

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

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

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

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

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

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a

photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

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

Curriculum coverage

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

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

7.10 Reporting systems for our pupils

We recognise that safeguarding is most effective when children feel listened to, respected and confident that adults will take their concerns seriously. We are committed to creating a culture in which children know how to seek help, understand that they will be listened to and believe that appropriate action will be taken.

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and readily accessible, so that pupils know who their trusted adults are, understand that they can report concerns about themselves or others, and feel confident to do so.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils are taught that they can talk to trusted adults in school if they have any worries or concerns.

7.10 Safeguarding children in alternative provision

Where Dunalley commissions alternative provision for a pupil, the school remains responsible for safeguarding the pupil and for satisfying itself that the placement is safe, suitable and appropriate. Appropriate due diligence and safeguarding checks will be undertaken before a placement begins and relevant safeguarding information will be shared with the provider.

Clear arrangements will be established for monitoring and reporting attendance, including the prompt notification of absence. The school will maintain regular communication with the provider and appropriate contact with the pupil, including welfare checks where necessary. The DSL will maintain appropriate oversight of safeguarding arrangements and any concerns will be responded to and escalated in accordance with this policy.

The suitability, safety and impact of the placement will be reviewed regularly and the school will maintain accurate records of where the pupil is being educated.

8. Online safety and the use of mobile technology

We recognise that online safety is an essential part of safeguarding and that technology is a significant component in many safeguarding and wellbeing issues. We are committed to protecting children from harm both online and offline through education, effective filtering and monitoring, clear expectations for technology use and robust safeguarding procedures.

To address this, our school aims to:

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

The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Develop pupils' digital resilience so they can recognise online risks, think critically about online content and know how to seek help if somethings make them feel unsafe or uncomfortable
- Ensure all staff receive regular training and updates on online safety, including cyber-bullying, online abuse, harmful sexual behaviour online, online exploitation, the risks associated with emerging technologies (including generative AI), and their responsibilities regarding filtering and monitoring.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make all staff aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

- Ensure filtering and monitoring arrangements are effective, proportionate, regularly reviewed and informed by the Department for Education's Filtering and Monitoring Standards.
- Carry out regular reviews of online safety arrangements, supported by an annual risk assessment, to ensure that policies, filtering and monitoring arrangements remain effective and responsive to emerging technologies and safeguarding risks.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies.

Safeguarding incidents, online safety concerns and emerging patterns or trends will be considered when reviewing the curriculum so that preventative education remains responsive to the risks experienced by children at Dunalley.

8.1 Artificial intelligence (AI)

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

The school recognises that generative artificial intelligence (AI) has significant educational benefits and may enhance teaching, learning and administrative processes. However, AI also presents safeguarding, privacy and ethical risks that require careful management.

Staff should remain professionally curious about where AI may have been used to facilitate bullying, harassment, exploitation, impersonation, the creation of indecent images, misinformation or other forms of abuse.

Any AI tool introduced for educational or administrative purposes will be appropriately risk assessed and approved in accordance with the school's data protection, safeguarding and online safety procedures before use.

9. Notifying parents or carers

The school recognises that working in partnership with parents and carers is usually in a child's best interests and is an important part of effective safeguarding practice. Wherever appropriate, concerns about a child will be discussed openly and honestly with parents or carers. However, the welfare of the child is paramount and there will be occasions when informing parents or carers is not appropriate.

The Designated Safeguarding Lead (DSL), or a deputy DSL, will normally lead discussions with parents or carers regarding safeguarding concerns. Other members of staff will only discuss safeguarding concerns with parents or carers following consultation with the DSL.

Parents or carers will not normally be informed before a referral is made where doing so may:

- place a child at increased risk of harm;
- prejudice a police investigation;

- compromise a Children's Social Care enquiry; or
- place another person at risk.

In such circumstances, advice will be sought from Children's Social Care and/or the police before any discussion takes place with parents or carers.

In cases involving allegations of abuse by one child against another, the school will normally inform the parents or carers of all children involved. Careful consideration will be given to the nature and extent of the information shared about other children, taking account of confidentiality, data protection and the advice of Children's Social Care and/or the police where appropriate.

The school recognises that both the victim and the alleged perpetrator may require safeguarding support. Decisions regarding support and information sharing will always be made on a case-by-case basis.

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

- meet with the victim and their parents or carers, where appropriate, to explain the safeguarding arrangements being put in place, consider the child's wishes and feelings, discuss the support available and explain how the report will be managed;
- meet with the alleged perpetrator and their parents or carers, where appropriate, to explain the support available, any safeguarding measures being implemented and the reasons for decisions affecting the child's education or school experience.

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

The school recognises that children with special educational needs and disabilities (SEND) or certain medical or physical health conditions may face additional safeguarding challenges and can be at greater risk of abuse, neglect and exploitation than their peers. Staff understand that these children may require additional support, greater vigilance and a more individualised approach to safeguarding.

All staff will be aware that additional barriers to recognising abuse or neglect may exist, including:

- assumptions that indicators of possible abuse, neglect or exploitation, such as behaviour, mood, injury or changes in presentation, relate to the child's disability, special educational need or health condition without further exploration;
- pupils being more vulnerable to bullying, including prejudice-based bullying, child-on-child abuse and social isolation;
- pupils being disproportionately affected by abuse or harmful behaviours without outwardly displaying obvious signs of distress;
- communication barriers that may make it more difficult for a child to recognise, understand, disclose or report abuse;

- cognitive differences that may affect a child's understanding of relationships, consent, appropriate behaviour, online content or the consequences of their own or others' actions;
- increased vulnerability to online abuse, exploitation, coercion or manipulation.

The school recognises that safeguarding approaches should be tailored to meet the individual needs of children with SEND and certain health conditions. Staff will consider each child's communication needs, level of understanding, preferred methods of communication and any additional support required to enable them to express their views, wishes and feelings.

Where appropriate, personalised safeguarding arrangements will be reflected within Education, Health and Care Plans (EHCPs), SEND Support Plans, Individual Healthcare Plans or other relevant support plans.

Any safeguarding concerns involving a child with SEND or a medical or physical health condition will be managed through close collaboration between the Designated Safeguarding Lead (DSL), the Special Educational Needs Co-ordinator (SENCO), relevant professionals and, where appropriate, the child's parents or carers, ensuring that the child's welfare remains paramount.

11. Pupils with a social worker

The school recognises that children who have, or have previously had, a social worker may be at increased risk of harm and may require additional support to safeguard and promote their welfare. These children may be vulnerable as a result of abuse, neglect, exploitation, family circumstances or experiences of adversity and trauma, which can have a lasting impact on their attendance, behaviour, emotional wellbeing, mental health and educational outcomes.

The DSL and all members of staff will work proactively with social workers and other relevant professionals to safeguard these children, promote their welfare and help them achieve the best possible educational outcomes.

Where the school is aware that a pupil has, or has previously had, a social worker, the DSL will ensure that this is considered when making decisions relating to the child's safety, welfare and education. This will include considering whether additional support or reasonable adjustments are required to help remove barriers to learning and participation.

This information will inform decisions relating to, for example:

- responding to persistent absence, unauthorised absence or children missing education where safeguarding concerns are known or suspected;
- providing appropriate pastoral, emotional and academic support;
- identifying the need for early help or additional multi-agency support;
- supporting transitions within and between educational settings;
- ensuring appropriate information is shared with relevant professionals to safeguard the child and promote their welfare.

The school will work in partnership with social workers, parents or carers (where appropriate) and other agencies to ensure that children receive coordinated support that is responsive to their individual needs and promotes their safety, wellbeing and educational achievement.

12. Looked-after and previously looked-after children

The school recognises that looked-after children and previously looked-after children may have experienced abuse, neglect, trauma, loss or instability and may therefore be particularly vulnerable. These experiences can have a significant impact on their safety, wellbeing, attendance, behaviour, relationships and educational achievement. The school is committed to providing the support and stability these children need to achieve positive outcomes.

We will ensure that staff have the knowledge, skills and understanding to safeguard and promote the welfare of looked-after and previously looked-after children. In particular, we will ensure that:

- appropriate staff understand each child's legal status, care arrangements, contact arrangements with parents or others who hold parental responsibility, and any arrangements delegated by the local authority;
- the Designated Safeguarding Lead (DSL) has up-to-date contact details for the child's social worker, Virtual School and other relevant professionals;
- safeguarding arrangements for looked-after and previously looked-after children take account of their individual experiences, vulnerabilities and identified risks.

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

The Designated Teacher is appropriately trained and has the knowledge, skills and experience necessary to fulfil this role effectively.

The Designated Teacher will:

- promote the educational achievement, attendance, wellbeing and inclusion of looked-after and previously looked-after children;
- work closely with the Designated Safeguarding Lead (DSL) to ensure safeguarding concerns are identified promptly and responded to effectively;
- work in partnership with the child's social worker, carers, parents (where appropriate), the Virtual School and other relevant professionals to promote positive educational and safeguarding outcomes;
- contribute to the development, implementation and review of Personal Education Plans (PEPs), ensuring that they reflect the child's educational and wider support needs;
- work with the Virtual School to ensure that Pupil Premium Plus funding is used effectively to remove barriers to learning and improve educational outcomes;
- support staff to understand the impact of trauma, attachment and adverse childhood experiences on children's learning, behaviour and relationships.

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

The school recognises that being lesbian, gay or bisexual is not in itself a risk factor for harm. However, children who are, or who are perceived to be, lesbian, gay or bisexual can be vulnerable to discriminatory bullying. Children who are questioning their gender may also experience particular vulnerabilities. The school is committed to ensuring that all pupils are treated with dignity and respect and can learn in a safe, inclusive and supportive environment. All forms of bullying, prejudice, discrimination and harassment will be challenged and addressed.

When supporting a child who is questioning their gender, staff will take time to understand the child's thoughts and feelings and will remain professionally curious about the full range of their experiences. Staff will be alert to potential vulnerabilities, including mental health or psychological needs, relationships with family and peers, discriminatory bullying, wider health issues and neurodiversity. Any safeguarding concerns about a child's welfare must be reported promptly to the Designated Safeguarding Lead (DSL) in accordance with this policy. As per para 9 of this policy, where appropriate we will discuss any concerns about the welfare of a child with the child's parents or carers.

The school will not initiate action regarding social transition. Where a child or their parent or carer asks the school to consider changes relating to social transition, the school will consider the request carefully and on an individual basis. The best interests and welfare of the child, and the best interests of other children, will be central to decision-making.

Parents and carers have the leading role in the lives of their children and will be engaged as a matter of priority where support with social transition is requested. Their views will carry significant weight and will be considered alongside the child's needs, any available clinical evidence or advice, relevant professional advice and any wider vulnerabilities. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child before parents or carers are contacted or any decisions are taken.

The school will take a very careful approach to social transition. Given the primary age of our pupils, particular caution will be exercised and support for full social transition is expected to be agreed very rarely. Where families are considering social transition for a pre-pubertal child, the school will have regard to the importance identified in Keeping Children Safe in Education of early clinical involvement and will take account of relevant clinical evidence or advice where this is available. School staff will not seek to undertake a clinical role for which they are not appropriately trained.

Any decision relating to a request for support with social transition will be carefully considered, with the decision-making process and rationale documented and appropriate records maintained.

In accordance with Keeping Children Safe in Education, the school will not allow children to use toilets designated for the opposite biological sex, including when responding to a request to support any degree of social transition. Where a child who is questioning their gender does not wish to use toilets designated for their biological sex, the school will consider appropriate alternative provision, such as a self-contained individual toilet. Any alternative arrangements will protect the safety, comfort, privacy and dignity of the child and of other children. Such arrangements will be appropriately recorded, communicated to those who need to know and reviewed regularly.

Where a child shares feelings about questioning their gender with a member of staff but does not ask the school to make changes to how they are treated, staff will respect the child's confidence unless there is a related safeguarding concern. Where a conversation raises concerns about the child's welfare or safety, staff will follow the school's usual safeguarding procedures.

The school recognises that safeguarding risks can be compounded where children do not have trusted adults with whom they feel able to share concerns. We are committed to creating a culture in which every child feels safe, respected and listened to, and knows how to seek support from trusted members of staff.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

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

14.2 Other complaints

Other complaints will be addressed through Dunalley's Complaints Procedure.

14.3 Whistleblowing

Dunalley has a Whistleblowing Policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

15. Record-keeping

The school maintains safeguarding records in accordance with statutory guidance, data protection legislations and the school's retention schedule. Accurate, timely and secure record keeping is an essential part of effective safeguarding practice.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded promptly on CPOMs. Records should be factual, accurate, clear, contemporaneous and distinguish between fact, professional opinion and the views of others.

Records will 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

Concerns, disclosures, discussions, decisions and actions will be kept in a separate child protection file for each child on CPOMs.

Should CPOMs be temporarily unavailable due to technological issues, staff must make handwritten records and hand them to the DSL or a Deputy so that they can be uploaded to the system. Hard copies of the concern form and body map are available from the staffroom noticeboard and in appendix 5.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely on CPOMs and only available to those who have a right or professional need to see them.

Safeguarding records will be retained in accordance with the school's records retention schedule and relevant statutory guidance.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. The school will obtain confirmation that the safeguarding records have been received by the receiving setting.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

Where safeguarding concerns are complex, ongoing or involve statutory agencies, the DSL will speak directly with the receiving DSL to ensure that information is understood, and appropriate safeguarding arrangements can be implemented without delay.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

The DSL will regularly review safeguarding records to identify patterns, cumulative concerns and emerging risks. This will help ensure that children receive timely support and that safeguarding decisions are informed by the full picture of a child's experiences.

16. Training

16.1 All staff

The school is committed to ensuring that all staff have the knowledge, skills and confidence to safeguard children effectively. Safeguarding training is an ongoing process that supports staff to recognise concerns, exercise professional curiosity, respond appropriately and contribute to a strong whole-school safeguarding culture.

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the three safeguarding partners

- Include online safety, filtering and monitoring, cyber security awareness and emerging technologies, including the safeguarding implications of generative artificial intelligence;
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils
    - Support staff to identify cumulative harm, recognise emerging safeguarding risks and understand the importance of early help and information sharing.

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

Staff will also receive regular safeguarding and child protection updates, including on online safety, throughout the year.

Staff who may be required to use reasonable force or other restrictive interventions will receive appropriate training in their safe and lawful use and in preventative and de-escalation strategies. Any use of reasonable force or restrictive intervention will be considered within the school's wider safeguarding responsibilities and in accordance with the Positive Behaviour Policy.

Volunteers and regular visitors will receive safeguarding information and training appropriate to their role and the level of contact they have with children before undertaking unsupervised activities.

16.2 The DSL and deputies

The DSL and Deputy DSLs will undertake training appropriate to their role to ensure they have the knowledge, skills, authority and confidence to carry out their safeguarding responsibilities effectively.

They will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Governors

Governors will undertake safeguarding training appropriate to their strategic role, enabling them to provide effective support and challenge, understand safeguarding risks and seek assurance that safeguarding arrangements remain effective.

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

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

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

16.4 Recruitment – interview panels

At least one member of every recruitment panel will have completed appropriate safer recruitment training in accordance with statutory guidance. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

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

16.5 Staff who have contact with pupils and families

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

Supervision also provides opportunities to reflect on safeguarding practice, discuss emerging concerns and promote professional wellbeing.

17. Monitoring arrangements

This policy will be reviewed at least annually by **the Headteacher** to ensure it remains compliant with current legislation, statutory guidance and local safeguarding arrangements.

The policy will also be reviewed and updated whenever there are significant changes to legislation, statutory guidance, local safeguarding procedures or the school's safeguarding arrangements, or following any safeguarding incident, audit or review where learning indicates that changes are required.

The Governing Board will review and approve this policy annually and will receive assurance that it is being implemented effectively through regular safeguarding reports, monitoring activities and safeguarding audits.

The implementation and effectiveness of this policy will be monitored through a range of quality assurance activities, including:

- safeguarding audits and reviews;
- governor monitoring and strategic oversight;
- safeguarding supervision and case reviews;
- monitoring of safeguarding records and referrals;
- staff training, safeguarding updates and professional development;
- pupil, parent and staff voice, where appropriate;
- review of safeguarding incidents, trends and emerging risks.

The school is committed to continuously reviewing and strengthening its safeguarding practice to ensure that all children are protected and supported effectively.

18. Links with other policies

Safeguarding is everyone's responsibility and is underpinned by a range of school policies and procedures. This policy should be read alongside the following policies, which together support the school's whole-school approach to safeguarding and promoting the welfare of children:

- Attendance
- Behaviour
- Anti-bullying
- Relationships, Sex and Health Education (RSHE)
- Online Safety
- Mobile Phone Use
- IT Acceptable Use
- Staff Code of Conduct
- Whistleblowing
- Complaints
- Equality
- Health and Safety
- First Aid
- Data Protection

Where appropriate, this policy should also be read alongside the school's safer recruitment procedures and other safeguarding guidance contained within the appendices to this policy.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2026.

Appendix 1: Types of abuse

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In many cases, multiple issues will overlap and children may experience several forms of abuse simultaneously. Staff should be alert to indicators of abuse, exploitation, neglect and other safeguarding concerns, recognising that safeguarding is about identifying the whole picture of a child's experiences and responding at the earliest opportunity.

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Specific safeguarding issues

Staff should be aware that safeguarding concerns may also arise in relation to specific issues including, but not limited to:

- Child-on-child abuse
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE), including county lines
- Domestic abuse
- Serious violence
- Mental health
- Children missing education
- Online safety
- Sharing nude and semi-nude images
- Upskirting
- Honour-based abuse (including forced marriage and female genital mutilation)
- Radicalisation and extremism
- Modern slavery and trafficking
- Prevent duty
- Missing children
- Private fostering
- Homelessness

- So-called "honour"-based abuse
- Substance misuse
- Technology-assisted abuse, including the misuse of artificial intelligence and digitally manipulated imagery

Further information on these safeguarding issues can be found throughout this policy and in Keeping Children Safe in Education (September 2026).

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

The school is committed to safeguarding and promoting the welfare of children and expects all staff, governors, volunteers and contractors to share this commitment. Safer recruitment forms an essential part of the school's safeguarding arrangements. Recruitment processes are designed to deter, identify and reject unsuitable applicants while ensuring that all appointments are made fairly, consistently and in accordance with statutory guidance.

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

We will use the GCC approved application form.

Our application information will:

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

Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
    - If they are known to the police and/or children's social care and
    - If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

In line with Keeping Children Safe in Education, we will carry out an online search on all shortlisted candidates as part of our due diligence. This search will help identify any publicly available information that may be relevant to the candidate's suitability to work with children. Candidates will be informed that these searches will take place.

Seeking references and checking employment history

References will be scrutinised to ensure that they are complete and consistent, and any discrepancies, anomalies or concerns will be explored with both the referee and the candidate before an appointment is confirmed.

When seeking references, we will:

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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

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

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

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

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

Existing staff

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

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

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

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

Agency and third-party staff

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

The school will also satisfy itself that the agency or third-party organisation has carried out the required safeguarding checks in accordance with statutory guidance.

Contractors

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

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

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

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

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

Governors

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

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

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

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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

Appendix 3: Allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

The school recognises that creating and maintaining a culture of openness, transparency and professional curiosity is essential to safeguarding children. All concerns about the conduct of adults working in or on behalf of the school will be taken seriously, responded to promptly and managed fairly, consistently, and in accordance with statutory guidance.

Those responsible for managing allegations and low-level concerns will exercise professional curiosity, considering the wider context, previous concerns, and any emerging patterns of behaviour when determining the appropriate course of action.

Section 1: Allegations that may meet the harm threshold

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

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

Concerns should always be reported without delay. Staff are not expected to determine whether a concern meets the harm threshold before reporting it.

Where there is any doubt about whether an allegation meets the harm threshold, advice will be sought from the LADO without delay. Information regarding this process is available here - The Role of the LADO & The Allegations Management Process | Gloucestershire County Council.

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

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

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

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

outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate

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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

The same safeguarding standards and expectations apply regardless of whether the individual is directly employed by the school, employed by an agency, contracted or volunteering.

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Following the conclusion of any allegation, leaders will consider whether there are lessons to be learned for safeguarding practice, staff training, supervision, recruitment procedures or school policy, regardless of the outcome of the case.

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Whilst a single low-level concern may not be serious in isolation, a pattern of low-level concerns may indicate that an adult's behaviour is becoming increasingly concerning. All concerns will therefore be considered in the context of any previous concerns, professional judgement and the wider safeguarding picture.

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Promoting professional curiosity and encouraging staff to challenge unsafe or unprofessional practice where appropriate.

Responding to low-level concerns

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

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

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

Where appropriate, advice may also be sought from Human Resources or the LADO if the nature or pattern of concerns indicates that the matter may meet the harm threshold.

Record keeping

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

Records will be:

- Factual, accurate, proportionate and distinguish between fact, professional opinion and the views of others.
- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our

disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the school **a**

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

References

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

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

Appendix 4: Specific safeguarding issues

Staff should be aware that safeguarding concerns rarely occur in isolation. Children may experience multiple vulnerabilities or forms of abuse simultaneously, and safeguarding issues often overlap. This appendix highlights specific safeguarding issues referenced in Keeping Children Safe in Education. It is not intended to be exhaustive and staff should always exercise professional curiosity, consider the wider context and report any concerns promptly to the Designated Safeguarding Lead (DSL).

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

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

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

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

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

Children who are absent from education

Persistent absence, repeated lateness and patterns of unexplained absence should always be considered as potential safeguarding indicators and explored appropriately. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

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

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for

something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

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

Child-on-child abuse

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

The school recognises that children who display harmful behaviour may themselves have experienced abuse, trauma or exploitation. Both the child who has experienced harm and the child whose behaviour has caused harm may require safeguarding support.

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

Staff should recognise that children may experience domestic abuse directly or indirectly and that its impact can be cumulative, even where children do not witness incidents first-hand. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

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

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

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

Homelessness

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

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

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

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

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

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

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

sFGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem

- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to children's social care
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

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

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period. Staff should remember that there is no single profile of a child who may be vulnerable to radicalisation and should avoid making assumptions based on appearance, background, ethnicity, faith or culture.

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

Staff should **always** act if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

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

Serious violence

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

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

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

- Being male
- Having been frequently absent or permanently excluded from school

- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors

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

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

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

Non-collection of children

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

- Phone the numbers provided by the family in priority order until we receive a positive response.
- Seek advice from Social Care if communication with emergency contacts does not adequately resolve the situation.
- Children will only be dismissed to known adults with the appropriate consent.
- Non-collection, actions and follow up will be recorded on CPOMs.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow local procedures: Children missing education | Gloucestershire County Council

Children requiring mental health support

All staff should be aware that mental health concerns may, in some cases, become safeguarding concerns where children have experienced abuse, neglect, exploitation, trauma or other adverse childhood experiences. Staff should remain alert to changes in behaviour, attendance, emotional wellbeing or presentation and report any concerns to the DSL.

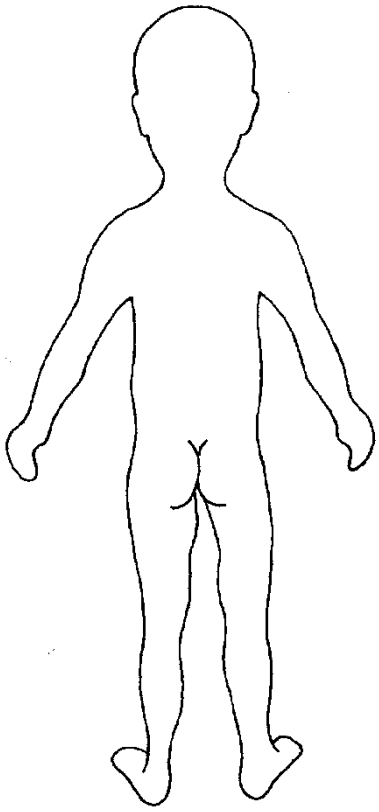
Appendix 5: Concern form and body map

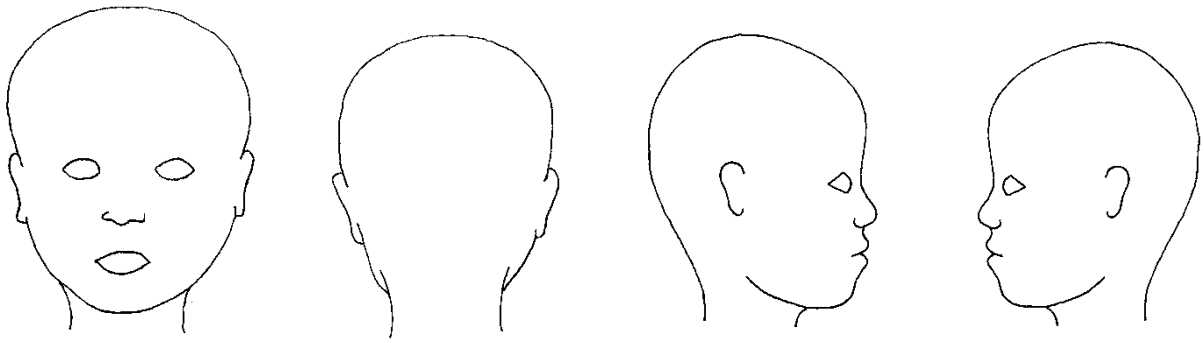
Concern / Disclosure Form
CONFIDENTIAL

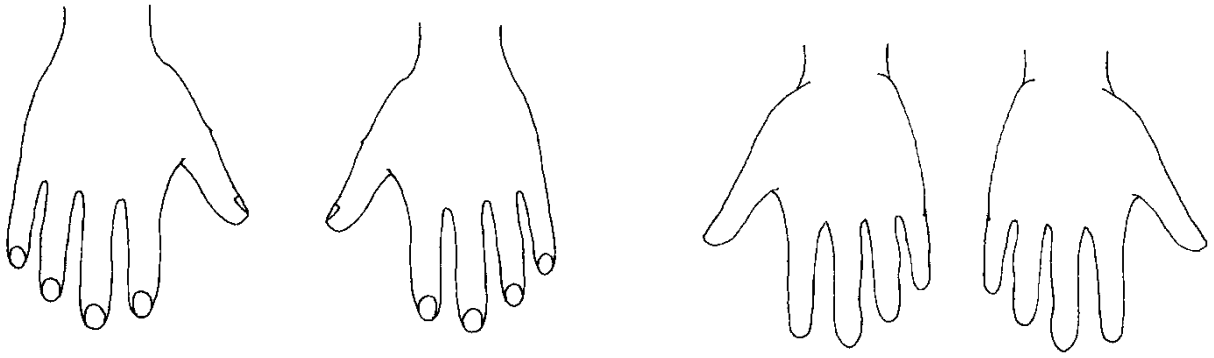
Date:	Time:
Name of child:	Name and role of person completing form:

Details of disclosure by child / incident / concerns:

Action taken by person(s) above:







Date and time of DSL/deputy notification:

Name of DSL/Deputy:

Detail of decision / action by DSL or deputy:

Reason(s) for this decision or action by DSL or deputy:

Notes of feedback between DSL / deputy and the person who raised this concern, including date of feedback:

Record of discussion with another professional (giving full name/ role and agency)

☐Tick to confirm added to pupil's CPOM chronology and copy placed in pupil's file