Roundhill Primary School Safeguarding and Child Protection Policy

Review Due:	**September 2026**
Last Review	July 2025
Applicable to:	All Trust Schools
Reviewed By:	NH
Approved By:	Trust Board August 2025

Comments:

This is an updated statutory policy which reflects the changes to regulation within the government's 'Keeping Children Safe in Education 2025' document.

All staff working directly with children are expected to read at least part 1 of KCSIE (those who don't work directly with children can read the condensed version of part 1, in Annex A).

Children includes everyone under the age of 18. For the purpose of this policy pupils with an EHCP plan will be safeguarded using the same procedures up to the age of 25. All references to children should be considered as "children and young people".

Where a pupil is 18+ references to children's social care should be substituted to adult social care.

Further updates may be required following revised guidance on Relationships, Sex and Health Education.

Further updates may be required following revised guidance on gender questioning children.

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1. Key Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL[1])	Richard Welch	"Richard Welsh" Richard.Welsh@roundhill-pri.co.uk T: 01225 424950
Deputy DSL (DDSL)	Emma Cooper Vicky Heslop	"Emma Cooper" Emma.Cooper@roundhill-pri.co.uk "Vicky Heslop" Vicky.Heslop@roundhill-pri.co.uk T: 01225 424950
Local authority designated officer (LADO)	Victoria Harlin	**Victoria Harlin is the Local Authority Designated Office (LADO) for Bath and North East Somerset.** *My working days are Tuesday, Wednesday, and Thursdays. On Mondays and Fridays there will be a duty system in place which will ensure you continue to be able to access advice and input from LADO. To contact LADO, please email **LADO@bathnes.gov.uk** – this is the best way to reach LADO as this is constantly reviewed throughout the day. When referrals or requests for information are received, they will be responded to within one working day. Should you wish to speak with LADO the telephone number remains as **01225 396810***
Headteacher	Emma Cooper	Emma.Cooper@roundhill-pri.co.uk
Chief Executive Officer (CEO)	Emily Massey	emassey@thepartnershiptrust.com
Director of Safeguarding	Natalie Hanna	nhanna@thepartnershiptrust.com
Chair of Governors		
Safeguarding Governor		
Safeguarding Trustee	Dawn Wilde	Email: dwildetrustee@thepartnershiptrust.com
Senior Mental Health Lead[2]	Richard Welsh	"Richard Welsh" Richard.Welsh@roundhill-pri.co.uk
Designated teacher	Richard Welsh	"Richard Welsh" Richard.Welsh@roundhill-pri.co.uk
Channel helpline[3]		020 7340 7264

[1] Within this document all references to the DSL should be taken to represent the DSL/DDSL and/or the wider safeguarding team
[2] All schools must have this by 2025 – delete if not appropriate
[3] Consent for support will be required

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Out of Hours	Children's Social Care on	Children's Social Work Services on 01225 39 61 11 or 01225 47 79 29 (weekdays, 8.30am to 5pm, except Fridays when we're closed from 4.30pm) For urgent out of hours assistance call the Out of Hours Emergency Duty Team **01454 615165**. Police non emergency: 101

2. Purpose and Scope

This Policy applies to The Partnership Trust ('the Trust') and all of its settings[4].
Overall, our aim is to create an environment and ethos in which children and young adults[5] feel secure, their views are valued, they are encouraged to talk and they are listened to. The Trust and all it's settings aim 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 /monitoring safeguarding issues.
- pupils develop relevant information, skills and attitudes to help them to resist abuse and prepare for the responsibilities of adult life including home and family.
- parents build an understanding of the school's responsibility to ensure the welfare of all children and a recognition that this may occasionally require that cases are referred to other investigative agencies as a constructive and helpful measure.
- all staff are aware of increased risk factors for pupils in our schools and particular groups of young people in addition to SEND pupils.
- all staff contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies and schools.

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
- Making sure 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

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025), Working Together to Safeguard Children (2023) and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school.
- 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.

[4] This includes any affiliated nurseries, extended services, post 16 provisions or colleges.
[5] Young adults refers to pupils accessing provision aged 18+. Within this document all references to children should be taken to represent children and young adults unless otherwise stated

- 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 Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
- The Education and Training (Welfare of Children) Act 2021.
- Apprenticeships, Skills, Children and Learning Act 2009.
- 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 schools under the European Convention on Human Rights (ECHR), Human Rights Act 1998.
- Governing bodies and proprietors should carefully consider how they're supporting their pupils and students regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race) under the Equality Act 2010.
- Public Sector Equality Duty (PSED) enables schools to positive action to deal with particular disadvantages affecting pupils (where you can show it's proportionate). This includes making reasonable adjustments for disabled pupils or for a particular group facing disproportionate abuse or harassment.
- This policy also complies with our funding agreement and articles of association.

3.1 Equality statement

Some children have an increased risk of abuse and additional barriers can exist for some children with respect to recognising or disclosing it. Children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).

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 or disabilities (SEND) or health conditions[6]
- 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[7]
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after[8]
- are missing from education
- whose parent/carer has expressed an intention to remove them from school to be home educated

[6] Appendix 2

[7] temporary accommodation or where there are issues such as substance abuse or domestic violence

[8] Appendix 2

3.2 Confidentiality

All schools within The Partnership Trust will adhere to the Trust's GDPR Data Protection policy with respect to sharing safeguarding information within our Trust and with the 3 safeguarding partners[9] and other agencies as required.

All staff should note that:

- timely information sharing is essential to effective safeguarding
- fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- the government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information[10]
- If staff are in any doubt about sharing information, they should speak to the DSL or DDSL

Confidentiality is also addressed in this policy with respect to record-keeping[11] and allegations of abuse against staff[12].

3.3 Reasonable force

Reasonable force refers to the physical contact to restrain and control children using no more force than is needed. The use of reasonable force is down to the professional judgement of the staff member concerned and will be determined by individual circumstances and the vulnerability of any child with Special Educational Needs or Disability (SEND) will be considered.

The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation and will follow government guidance outlined below:

- Use of Reasonable Force in Schools (2013)
- Reducing the need for restraint and restrictive intervention (2019)

There is robust recording of any incident where positive handling or restraint has been used. Further review of the incident is carried out to reflect on how the incident could be avoided. This will involve the child and their family.

The process around how the school manages concerns where a professional may pose a risk to pupils and our response to low level concerns can be accessed in **concerns about a staff member, volunteer or contractor;** section 7.7 of this policy.

3.4 Links to other policies

This policy links to the following Trust policies and procedures:

- Staff code of conduct
- Governor and Trustee code of conduct
- Complaints
- Health and safety
- Equality policy
- GDPR Privacy notices
- GDPR and Data Protection
- Whistleblowing Policy

[9] The local authority (LA), Integrated Care Boards for an area within the LA, The chief officer of police
[10] Appendix 7
[11] Section 6
[12] Appendix 4

- Acceptable Use of internet and ICT Policy
- Management of Contractors Policy
- Online safety
- Exclusions Policy
- Attendance policy
- Safer Recruitment Policy

and the following school policies:

- Behaviour and Anti-bullying Policy
- Sex and relationship education policy
- First aid
- Curriculum documents

3.5 Monitoring arrangements

This policy will be reviewed **annually** by The Trust Board. It is the responsibility of the school's Local Governing Body (LGB) to ensure that the policy is in place at school level and that any areas for personalisation have been completed.

4. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers (including Trustees and Governors) and is consistent with the procedures of the 3 safeguarding partners. This policy and its procedures cover all settings, including where pupils aged 18+ (who for the purposes of safeguarding are classed as adults) are enrolled. It also applies to extended school and off-site activities.

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

4.1 All staff[13]

All staff working directly with children must read and understand at least part 1 of the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), and review this guidance at least annually.

All staff must sign a declaration at the beginning of each academic year, or on appointment if mid-year, to say that they have reviewed the guidance.

All staff will be aware of:

- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- systems which support safeguarding, including this child protection and safeguarding policy and all supporting policies[14]
- the role and identity of the designated safeguarding lead (DSL) and deputies.
- the early help process[15] and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as Female Genital Mutilation (FGM), and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

[13] Including volunteers, contractors, Governors and Trustees
[14] Section 3.4
[15] sometimes known as the common assessment framework

- the signs of different types of abuse, neglect and exploitation[16].
- specific safeguarding issues[17].

4.1a Continuous Professional Development (CPD)

All staff members[18] will undertake safeguarding and child protection training as part of their induction; including on whistle-blowing procedures, online safety and Prevent[19] to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect and exploitation.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach, wider staff training and curriculum planning
- Ensure that all staff undergo safeguarding and child protection training including online safety[20], at induction.
- Be in line with advice from the 3 safeguarding partners
- Include regular safeguarding and child protection updates as required[21], but at least annually including online safety
- 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

4.2 The designated safeguarding lead (DSL)

The full responsibilities of the DSL and deputies are set out in their job description.
The DSL is a member of the senior leadership team. Details of the DSL are set out at section 1 of this policy.
The DSL takes lead responsibility for child protection and wider safeguarding.
During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
Out of school hours the DSL can be contacted by email (see paragraph 1).
When the DSL is absent, the school's DDSL/DDSLs – will act as cover.
If the DSL and deputy/deputies are not available[22], members of the Senior Leadership Team will act as cover.
One of these named people will be available to contact during all times as identified in section 1 of this policy.
The DSL will:

- Be given the time, funding, training, resources and support to carry out their role effectively.
- Provide training, 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 and young adults and liaise with parents concerning any necessary action or support
- Refer suspected cases, as appropriate, to the relevant body[23] and support staff who make such referrals directly
- Keep the headteacher informed of any issues

[16] Appendix 1
[17] Appendix 2
[18] Including contractors who are provided through a private finance initiative (PFI) or similar contract and volunteers (where applicable)
[19] The government's anti-radicalisation strategy referenced in Appendix 3
[20] The term online safety includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
[21] through emails, e-bulletins and staff meetings
[22] during out-of-hours/out-of-term activities
[23] local authority children's social care, Channel programme, Prevent program, Disclosure and Barring Service, and/or police

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Keep written records of all concerns, discussions and decisions, including the rationale for those decisions[24]

4.2a DSL/DDSL Continuous Professional Development (CPD)

In addition to the training for all staff the DSL and deputies will:

- Undertake child protection and safeguarding training at least every 2 years
- Update their knowledge and skills at regular intervals[25] and at least annually

4.3 The Board of Trustees (The Board) and Local Governing Body (LGB)

Overall responsibility for safeguarding and child protection lies with the Board of Trustees.

Responsibility for ensuring that this policy is implemented is delegated to the CEO and school's Headteacher (see section 4.4)

The LGB are responsible for

- monitoring the implementation of this policy.
- review the DfE's filtering and monitoring standards.

The CEO is responsible for

- Ensuring the DSL has the appropriate status and authority to carry out their job
- Ensuring that they are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty (PSED).
- Holding the Headteacher to account for the effectiveness of safeguarding and supporting the school's Headteacher to facilitate a whole-school approach to safeguarding, ensuring that safeguarding, child protection and online safety, including understanding the filtering and monitoring systems and processes in place, are at the forefront and underpin all relevant aspects of process and policy development
- Appointing a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

4.3a Continuous Professional Development (CPD)

All governors receive safeguarding training to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
All Governors:

- Receive appropriate safeguarding and child protection training at induction and at least annually.
- Receive regular updates to equip them with the knowledge to provide strategic challenge.
- Read Keeping Children Safe in Education in its entirety.

4.4 The headteacher

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

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

[24] This should include instances where referrals were or were not made to another agency

[25] through e-bulletins, meeting other DSLs, Trust Cluster meetings or taking time to read and digest safeguarding developments

- Acting as, or allocating, the 'case manager' in the event of an allegation[26] of abuse made against another member of staff or volunteer
- Ensuring the relevant staffing ratios are met
- Making sure each child in the Early Years Foundation Stage (EYFS) is assigned a key person

4.5 The designated teacher

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

As part of their role, they will:

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

4.5a Continuous Professional Development (CPD)

The designated teacher is:

- appropriately trained
- has the relevant qualifications and experience to perform the role.

4.6 Mental Health and Well-being

The Trust and all of its schools are committed to promoting the well-being and mental health of pupils. All schools are expected to have a named staff member to lead on mental health who can support the development of knowledge and act as a point of expertise to promote the well-being and mental health of pupils. This colleague will have sufficient training in mental health and safeguarding for them to carry out their role effectively.

The mental health lead will:

- Support early identification of vulnerability[27] to mental health problems by reviewing attendance, behaviour, attainment, and safeguarding records at least on a termly basis.
- ensure that pupils can report and share concerns.
- follow a safeguarding process in terms of reporting concerns so the DSL can assess whether there are any other vulnerabilities can be identified and proportionate support considered.
- support staff to ensure the immediate health and safety of a pupil who is displaying acute mental health distress. This may require support from emergency services via 999 if the leaner is at risk of immediate harm.
- work with the DSL to consider whether a case can be managed internally, through early help, or should involve other agencies as required.
- communicate and work with the pupil and parents/carers to ensure that interventions are in the best interests of the child.
- liaise with the DSL and other staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.
- access specialist advice through targeted services.

[26] Appendix 4
[27] Appendix 2

5. Recognising abuse and acting

Staff[28] must follow the procedures set out below in the event of a safeguarding issue. In this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

Make a referral to children's social care[29] and/or the police[30] **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

All incidents that fall within this category **must** be reported to the Trust's Chief Executive Officer **without delay** and always within 24 hours[31].

5.2 If a child makes a disclosure

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Record your conversation as soon as possible in the child's own words using CPOMs. Stick to the facts, and do not put your own judgement.
- Do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Following the disclosure, if you have concerns that a child is suffering, or is likely to suffer, harm see section 5.1.

If the disclosure involves harmful sexual behaviour (HSB[32]) or problematic sexual behaviour (PSB)[33] 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/have 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)

[28] Including volunteers, governors and appropriate contractors within this section
[29] Link to report child abuse to a local council
[30] Link to report a crime or incident to the police
[31] Appendix 6
[32] Appendix 3
[33] Including the sharing of nudes or semi-nudes

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (eg owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes[34]

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.

5.3 If you have concerns about a child

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/adult social care[35]. 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. There are 2 possible routes to escalate a concern to other agencies.

5.3a Early help: Early help support for children of all ages improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. For more information about Early Help see the link below.

Early Help Assessment (EHA) and Supporting Documents – Professional Choices

5.3b Referral: If it is appropriate to refer the case to local authority children's/adult social care or the police, the DSL will make the referral or support you to do so.

The local authority will decide 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.

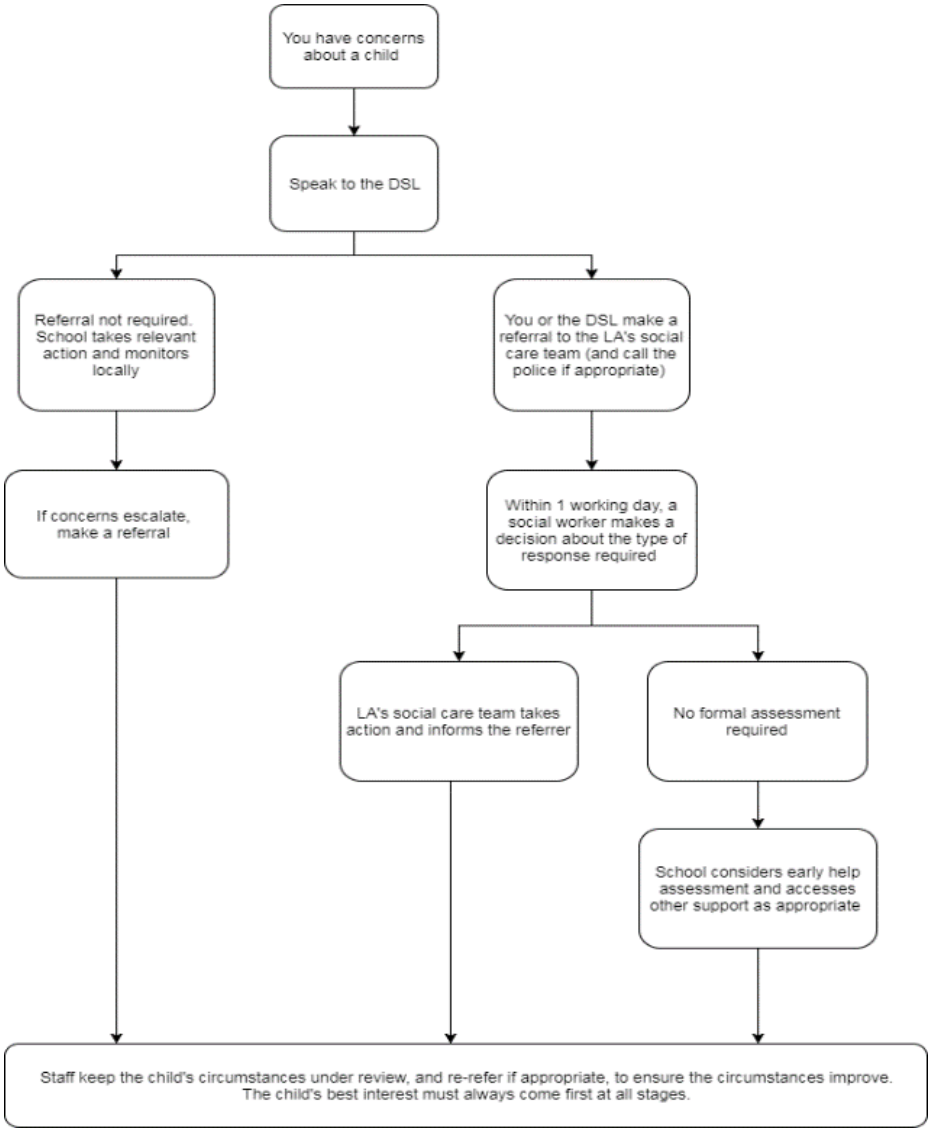
If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Protocol for Resolving Professional Differences in Work Relating to the Safety of Children.

The procedure if you have concerns about a child's welfare is shown below:

[34] suicidal or self-harming

[35] Appendix 8



5.4 If you have concerns about extremism

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

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

The Department for Education 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.[36]

[36] not for use in emergency situations

5.5 Child-on-child abuse[37]

5.5a Proactive measures to prevent child-on-child abuse

All settings within the Trust will minimise the risk of child-on-child [38]abuse taking place by adopting a contextual approach to safeguarding. This enables us and other support services to better identify high-risk groups, areas and environments within our community that increase the risk of abuse occurring and take appropriate action.

The DSL will review and consider whether any practice or environmental changes can be made in relation to any areas for development. This might include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics on the curriculum.

For all schools, this includes:

- A zero-tolerance approach to all types of abuse.
- Incidents being taken seriously and followed up as part of behavior support and analysis.
- Banter and teasing are acknowledged and recognised as bullying behaviour and may require proportionate support and intervention[39].
- Mitigating the risk of contributing to a culture of unacceptable behaviours through education, restorative approaches and reflective learning.
- Reflecting on equality issues, in terms of those who may be targeted are more likely to have protected characteristics, through behaviour analysis and record keeping.
- Early identification of vulnerability to child-on-child abuse is made by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.
- Working in teams to support behaviour, safeguarding, needs and interventions
- A planned programme of relationships, sex (RSE) and health education, which is age appropriate, inclusive and delivered regularly, tackles issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence (such as forced marriage and FGM), and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.5b If you have concerns about child-on-child abuse

There are clear systems in place for pupils and staff to report any abuse knowing their concerns will be treated seriously and respectfully.

Settings will handle initial reports of abuse by:

- securing the immediate safety of pupils involved in an incident and sourcing support for other young people affected.
- following procedures outlined in 5.2 and/or 5.3
- ensuring that the child will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.
- ensuring the child's wishes are taken into consideration in any intervention and any/all action is taken to ensure safety of the target and other members of the wider peer cohort.
- making the child aware that it is likely the information will need to be shared with others.

[37] Also referred to as peer-on-peer abuse

[38] Appendix 2

[39] In line with the behaviour policy

5.6 Reporting systems for pupils

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 easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Empower pupils to share concerns with any familiar adult
- Direct pupils to key people to contact if they feel unsafe through posters around the school
- Address how to discuss concerns through the PHE curriculum, RSE and in weekly assemblies
- Ensure pupils are able to discuss their own concerns and those of their peers with adults in the school and they are aware of the procedures in place to escalate these

5.7 Notifying parents/carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's/adult social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

5.8 Concerns about a staff member[40]

Concerns regarding staff can be categorised as:

- Low level concerns
- Allegations that may meet the harm threshold

If you have concerns about a member of staff or an allegation is made about a member of staff posing a risk of harm to children, speak to the headteacher.
If the concerns/allegations are about the headteacher, speak to the Trust CEO.
Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff to the headteacher, discuss the case with the CEO and/or report it directly to the local authority designated officer (LADO).
Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescales.

[40] Appendix 4

6. Record-keeping

We will hold records in line with the Trust's records retention schedule[41].
All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

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[42]

Concerns and referrals will be logged using CPOMS, and any historic, paper-based files, will be scanned in and saved to the pupil's records.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right, or professional need, to see them.
Safeguarding records relating to individual children will be retained for a reasonable period of time[43] after they have left the school.
Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

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

7. Online safety and the use of mobile technology[44]

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

To address this, settings:

- have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- protect and educate the whole school community in it's safe and responsible use of technology, including Artificial Intelligence (AI), mobile and smart technology[45]
- set clear guidelines for the use of mobile phones for the whole school community[46] including access to mobile networks on school site
- establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

[41] Records management policy
[42] This should include instances where referrals were or were not made to another agency
[43] See retention schedule: Appendix 2 of the Records Management Policy
[44] This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.
[45] referred to as mobile phones
[46] Acceptable use policies

7.1 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[47]
- **Contact** – being subjected to harmful online interaction with other users[48],
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm[49]
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

7.2 To address the risks above we will:

- Educate pupils about online safety as part of our curriculum.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.
- All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings.
- Share clear procedures with parents so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carefully consider the management of personal devices on school premises and reflect this in the online safety policy.
- Carry out an annual review of our approach to online safety, supported by relevant actions included on safeguarding action plan that considers and reflects the risks faced by our school community.

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

7.3a Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE, PSHE education and computing programmes as age appropriate Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

[47] such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories

[48] 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

[49] 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

- The receipt of such images

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

7.3b 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 (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[50].

8. Complaints and concerns about school safeguarding policies

8.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be managed in accordance with our procedures for dealing with allegations of abuse made against staff[51].

8.2 Other complaints

All complaints will be managed by the DSL and Headteacher in accordance with the procedures outlined in The Trust's complaints policy.

8.3 Whistle-blowing

If you have a concern about illegal activity, wrong-doing, behaviour which may impact children in a negative way or you believe someone's health and safety to be at risk, please refer to the Trust's whistleblowing policy.

9. Additional Protocols/Procedures

9.1 Non-collection of children

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

- Wait with the child for 15 minutes to allow for traffic etc.
- The staff will then ring the first contact number given on the child's registration form.
- If they are not able to contact the first name, they will try all subsequent numbers.
- If, after trying all quoted numbers and 30 minutes has elapsed, the manager will the contact the police/duty social worker.
- Safeguarding procedures will then be implemented.
- Staff will remain with the child at all times whilst ensuring that they are reassured and comforted, however from this point the police/social services will take up the task of tracking the child's family.

9.2 Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. A dynamic risk assessment should consider the supervision of the other pupils, when the pupil was last seen and the likelihood of the missing child being located on site. If a child goes missing, we will:

[50] Appendix 3
[51] Appendix 4

- Complete an initial search which may include all, or some of, the following checks:
  - Members of staff will be directed to check grounds and rooms to ensure the pupil has not hidden or been accidentally locked in/out anywhere within the boundary e.g. behind electronic gates or toilets
  - One nominated member of staff should leave the site to look around the immediate locality
  - Other parts of the sites are to be contacted to check the pupil has not joined another group after an activity or outing if appropriate
- If the initial search does not locate the pupil, a member of staff should contact all members of staff still on site who will in turn inform their departments.
- If the pupil remains missing, then the following procedure should be followed:
- Contact the Headteacher or a member of the senior leadership team[52] and office staff who will simultaneously:
  - Seek police advice
  - Contact parents

If a pupil goes missing off site follow the same procedure.

9.2 Pupils absconding from school site

To abscond is to 'leave without permission'.
Schools and other education settings owe a duty of care towards their pupils. This duty of care requires that all reasonable steps are taken to ensure that pupils are safe and remain within the care of the school at all times throughout the school day and during school led activities.
It should be noted that a pupil absconding from school is a rare event. There is a clear difference to a pupil being found to be missing, and a pupil leaving the premises with permission. At all times staff must be aware that active pursuit may encourage the pupil to leave the immediate vicinity of the school and may also cause the pupil to panic, possibly them at greater risk.

- Staff must follow the pupil to the perimeter and must try to persuade the pupil to stay in the school from the school side of the perimeter using known motivators.
- The Headteacher or Senior Leader should be informed if possible (a member of staff MUST remain with the child[53]).
- If possible an additional member of staff should approach the outside of the perimeter out of line of site of the child to be ready to block exit routes.
- If the pupil leaves the vicinity of the school grounds, staff should follow at a safe distance and attempt to persuade the child to return.
- An additional member of staff should try to get in front of the child (possibly using their vehicle) to block their way.
- There should always be more than one member of staff.
- If appropriate, physical intervention can be used to safely return the child to school. A dynamic risk assessment should consider the potential to reignite the incident, the function of the behaviour and the potential of increased risk to the pupil.
- If it is not possible for the staff to return the child to school, it is deemed that the child is in danger, or staff lose sight of them, the police will be contacted by dialling 999.
- Parents/carers will be contacted in a timely manner, but the first priority must always be the safety of the child.
- If the pupil returns of their own volition, parents/carers and the police will be informed as soon as possible.
- Upon their return to school, and when the pupil is calm, there will be a pupil debrief which may also include reviewing risk assessments, behaviour plans and any consequences in line with the behaviour policy.
- Headteacher or Senior Leader will brief police (if they have been involved) and parents.
- BANES Health and Safety will be notified using the One Stop reporting process and a member of the Local Governing Body will be informed.
- Logs of the incident will be reviewed and lessons learned will impact any necessary changes to policy and procedure.

[52] In the absence of the Headteacher the CEO or Safeguarding Lead for the Trust should be notified
[53] This is known as an "eyes on" policy

~~The Department for Education's Tackle Child Abuse campaign has accessible videos to watch https://tacklechildabuse.campaign.gov.uk/~~

Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

Abuse, neglect and exploitation are defined as the maltreatment of a child or young person whereby someone may abuse, neglect or exploit a child by inflicting harm, or by failing to prevent harm. They may be abused by an adult or adults or by another child or children. (KCSIE, 2025).

The following are the definitions of abuse, neglect and exploitation as set out in Working Together to Safeguard Children (2023). The ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact on the welfare and development of our children and where we have concerns that a child or young person may be at risk of abuse, neglect or exploitation[54] to take appropriate action as early as possible.

Physical abuse: A form of abuse which causes physical harm to a child[55]. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter[56]; protect a child from physical and emotional harm or danger; ensure adequate supervision[57]; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying[58], causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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 the child is aware of what is happening or not. The activities may involve physical contact, including assault by penetration[59] or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse[60]. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

[54] one or more categories can apply
[55] may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise
[56] including exclusion from home or abandonment
[57] including the use of inadequate care-givers
[58] including cyberbullying
[59] rape or oral sex
[60] including via the internet

The DSL and all members of staff will work with and support other professionals to help protect all vulnerable children (both online and offline) and follow the reporting procedures outlined within section 5 of this policy. Practitioners should be alert to vulnerable groups and to the potential need for early help to a child in the following groups.

Pupils in contact with the justice system – age-appropriate guides for schools to support children have been published: 5 to 11 year-olds and 12 to 17 year-olds

- Children in the court system
- Children affected by parental or familial offending/imprisonment or with a parent or carer in custody

Disabled Pupils and Pupils with special educational needs, disabilities or health issues (SEND)

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. To address these additional challenges, schools and colleges should consider extra pastoral support for children with SEND. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Children with SEND are 3 times more likely to be abused than their peers

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or unexplainable and/or persistent absences where there are known safeguarding risks
- The provision of pastoral and/or academic support
- Access to, and funding for, extra-curricular activities

Looked-after and previously looked-after children

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

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

Children who are absent or missing from education

A child being absent from education for prolonged periods and/or on repeat occasions, particularly repeatedly[61], can be a warning sign of a range of safeguarding issues. 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 unexplainable and/or persistent absences [62]. It is important the school's response to persistently absent pupils and children with unexplainable and/or persistent absences supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

[61] Or those with persistent absence

[62] such as travelling to conflict zones, sexual abuse/exploitation/child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM and forced marriage

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveler 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[63] and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Pupils Accessing Alternative Provision

Where a school places a pupil in an alternative provision, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs and has carried out checks in line with our Alternative Provision policy and guidance.

Pupils impacted by their social environment[64]

We recognise the importance of factors outside of school life impacting on the safeguarding of pupils within schools. We will liaise with other education settings who may have siblings attending and local agencies that may hold additional information which will support early identification of harm and in turn develop the assessment of need. Agencies will share 'Missing persons' notifications[65] with education settings with a view to support them to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes.

- Being **bereaved**
- Has experienced multiple **suspensions**, is at risk of being **permanently excluded**
- Is frequently **missing**/goes missing from education, home or care
- **Domestic Abuse**: Avon and Somerset notify education settings through the Education Safeguarding Service whenever they have responded to a domestic abuse incident[66]. This enables the education setting to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes.
  - Children who see, hear or witness the effects of domestic abuse are also victims.
  - Witnessing domestic abuse can have a lasting impact on children
  - Children can be victims, and perpetrators, in their own relationships too. The abuse can be physical, sexual, financial, psychological or emotional
  - Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships)
- Being **homeless** or being at risk of **becoming homeless** presents a real risk to a child's welfare. The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity
- **Private Fostering** arrangement is one that is made privately[67] for the care of a child:

[63] Attendance policy
[64] Contextual safeguarding
[65] a learner is reported missing from home or care
[66] Operation Encompass
[67] without the involvement of a local authority

- under the age of 16 years (under 18, if disabled)
- by someone other than a parent or close relative[68]
- with the intention that it should last for 28 days or more.

Cases of private fostering arrangements must be reported to children's social care to ensure that needs are adequately made. Statutory guidance states that this should be done at least 6 weeks before the arrangement is due to start or as soon as you are made aware of the arrangements. Not to do so is a criminal offence.

- **A Young Carer** is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances.
- **Young people questioning their gender/identity:** Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience. Settings should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents, and create a culture where pupils can speak out and share any concerns.
- **Child Exploitation** is an umbrella term for the abuse and crimes against children. This may involve an exchange for something the victim wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and can take the following forms:
  - Child Sexual Exploitation (CSE): If the learner is at risk of CSE or there is intelligence which indicates that the learner or peer group are at risk of CSE, the school will share information with Operation Topaz. This information will support proactive activity to disrupt criminal activity in relation to sexual exploitation.
  - Child Criminal Exploitation (CCE)[69]: If the learner is at risk of CCE information should be shared with Somerset's Violence Reduction Unit - The VRU can advise and support settings to manage risk. Targeted support maybe available to disrupt learners from getting involved with criminality. There has been local guidance issued on the issue of 'Offensive Weapons in Education Settings'. It is important to note that should a weapon be used or there is threat of use, the police should be called immediately.
    - The same day a weapon is found the school should call for a multi-disciplinary assessment of risk.
    - The decision to exclude remains with the Headteacher, although consultation with other agencies is recommended that to ensure there are no further risks[70]
    - Police must be notified
  - Child on Child Abuse or Peer-on-peer abuse: is when children abuse other children. This type of abuse can take place inside and outside of school and online. Abuse in intimate relationships between children is sometimes known as 'teenage relationship abuse'. Child on child abuse is most likely to include, but may not be limited to:
    - Bullying
    - Abuse in intimate personal relationships between peers
    - Physical abuse[71]
    - Harmful Sexual Behaviour[72]
    - Upskirting
    - Initiation/hazing type violence and rituals
    - Online grooming and abuse
  - Radicalisation: All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard[109] to the need to

[68] 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents

[69] including County Lines, modern day slavery and trafficking

[70] Alternatives to exclusions should be considered first in recognition that by doing so a learner it may be at further risk of harm out in the community

[71] this may include an online element which facilitates, threatens and/or encourages physical abuse

[72] Appendix 3

prevent people from becoming terrorists or supporting terrorism".[110] This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes:

- risk assessment,
- working in partnership,
- staff training, and
- IT policies.

- Modern Slavery and Trafficking for the purpose of Child Exploitation
- Honour[73] based Abuse[74]

Definitions

- **Child protection** is defined in Section 47 of the Children Act 1989 as when a child is suffering or is likely to suffer significant harm.
- **'Victim'** is a widely understood and recognised term, but not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. You should be prepared to use any term the child feels most comfortable with when managing an incident
- **'alleged perpetrator' and 'perpetrator'** are widely used and recognised terms, but you should think carefully about what terminology you use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. You should decide what's appropriate and which terms to use on a case-by-case basis
- **Children** includes everyone under the age of 18. For the purpose of this policy pupils with an EHCP plan will be safeguarded using the same procedures up to the age of 25.
- The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
  - The local authority (LA)
  - Integrated Care Boards for an area within the LA
  - The chief officer of police for a police area in the LA area
- The mandatory duty to report **Female Genital Mutilation[75]** is a legal duty for all professionals undertaking teaching work to report known cases of FGM to the police via 101. These cases must be referred to the DSL who will support them to carry out their duty and to risk assess urgency and next steps.
- It is advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care so an assessment of need and support is concurrently considered. This is when they:
  - are informed by a girl under 18 that an act of FGM has been carried out on her; or
  - observe physical signs which appear to show that an act of FGM has been carried out on
- If during the working hours of the Child Duty Team, call them first as they will be able to support with a Risk Assessment, which will give a clearer indication as to next steps. They also have access to other services e.g. health, and hold more information than the police have access to.
- In parallel, call 101 stating that you suspect a possible case of FGM so police can then complete their investigations.
- **Online Safety**: Annex D of Keeping Children Safe in Education highlights additional actions schools should take to keep learners safe online. For concerns around individual cases where a child has been harmed through online mediums, advice and guidance can be made through the Professional Online Safeguarding Helpline, T: 0344 381 4772, E: helpline@saferinternet.org.uk Where there have been established cases of online abuse or grooming, the school settings should alert - Child Exploitation and Online Protection command (CEOPS) https://www.ceop.police.uk/ceop-reporting/

[73] So-Called
[74] including Female Genital Mutilation and Forced Marriage
[75] FGM

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive. HSB can occur online and/or face-to-face and can also occur simultaneously between the 2.
Child-on-child sexual violence and sexual harassment is a form of HSB where sexual abuse takes place between children of a similar age or stage of development.
Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected sexualised behaviour which doesn't have an overt element of victimisation or abuse.
In **England**, the Department for Education (DfE) has also provided advice for schools and colleges on how to prevent and respond to reports of Sexual violence and harassment between children (DfE, 2021).

What you need to do
Statutory guidance for schools in England says leaders should act on the assumption that all children and young people are affected by child on child sexual abuse and harassment (Department for Education (DfE). To help keep children safe, this is best practice for everyone working or volunteering with children but it can be difficult to know how best to protect children from HSB, PSB and child on child sexual abuse.
This HSB protocol has been developed to clarify the measures and Mitigation used by The Mendip School to proactively, actively and reactively manage Harmful Sexual Behaviour (the umbrella terminology for all sexual behaviours).
To support identification of Sexual Behaviour using the Traffic Light Tool[76] (produced by Brook).
Schools need to:

- understand legislation and guidance relating to HSB, PSB and child on child sexual abuse
- create a safe culture for all children and young people
- put policies and procedures in place

Proactive Considerations

Codes of conduct
Our school has a code of conduct which clearly sets out what behaviour is and is not appropriate for adults and children. This helps make sure everyone knows what behaviour is appropriate.
Our code of conduct sets out how we will support children and young people to behave appropriately and what the consequences will be if they are unable to follow the code.

Continuous Professional Development
All staff and volunteers receive regular training to help them understand whether sexual behaviour is developmentally typical, problematic, harmful or abusive and know what action to take. Trustees and school governors have a good understanding of what sexualised behaviour is, when it can pose a risk to children and how to keep children safe.

Reviewing and updating
Training, policies and procedures are updated regularly to make sure they are up-to-date with national guidance and reflect the needs of the children and young people we work with.
Clear records of any incidents of PSB, HSB or child-on-child abuse are kept, and we analyse these regularly. This helps identify patterns and improve the measures we are taking to keep children safe.
We look out for potential patterns of concerning, problematic or inappropriate behaviour, and where you identify a pattern, decide on a course of action. When dealing with any incidents of HSB or PSB we consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether extra teaching time and/or staff training could minimise the risk of it happening again.

Creating a safe culture
Our school works hard to create a healthy and safe environment for all children and young people. This includes developing a culture where all kinds of problematic, harmful and abusive sexual behaviour are recognised and

[76] brook_traffic_light_tool.pdf (eastsussex.gov.uk)

addressed. We have implemented a whole school approach towards responding to HSB which includes our policies, procedures and training.

Sharing policies and procedures
Safeguarding and child protection policies and procedures are shared with staff, volunteers, parents and carers. This ensures everyone understands what they need to do to help prevent and tackle problematic, harmful and abusive sexual behaviour.
We also have a pupil friendly approach to sharing this information using the So-Safe framework (see our RSE policy for more information).
Sharing this information can:

- help children and young people understand that any incidents of problematic, harmful or abusive sexual behaviour will be taken seriously and responded to effectively
- help them know who to talk to if anything upsetting has happened
- encourage them to speak out if they are worried about their own or someone else's behaviour.

This information is accessible, clear and visually supported.

Modelling appropriate behaviour
Staff and volunteers' model respectful and appropriate behaviour. All understand and agree to follow our codes of conduct. Staff and volunteers are supported to respond consistently and appropriately to any incidents of sexualised behaviour. Children and young people understand that our school wants to keep them safe.
All inappropriate behaviour (even if it is relatively innocuous) will be addressed and school behaviour policies will be applied. Restorative approaches support all involved to understand the impact on others, resolve differences and support stronger, healthier relationships.

The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

Active Considerations

Safe environments
Environments are monitored and behaviour data is analysed to identify any locations where there are concerns about child-on-child sexual abuse taking place. Any identified areas are risk assessed and mitigations may include:

- Increased supervision
- Open door policies
- Low level concerns collated and actioned
- Robust procedures for any misconduct in line with Trust policies
- Empowering pupil voice and parental feedback/coproduction
- Online safety training and support
- Supporting learning through interventions using So-Safe and Scarf
- Working with other agencies
- Transport routes

Children's understanding of sexualised behaviour
Children may not always understand that they have experienced or displayed problematic or harmful sexual behaviour. This might be because:

- they don't understand what constitutes appropriate, problematic or abusive sexualised behaviour
- they have experienced sexual abuse
- they don't know whether consent was given
- the abuse happened between friends or partners
- the abuse took place online
- they blame themselves for being abused
- they haven't received appropriate relationships and sex education

All adults employed by the school to work directly with children are able to have age-appropriate discussions with children and young people about sex and relationships. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour is an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma and it is important that they are offered appropriate support.

Helping children speak out

Children might not always feel able to talk to adults about sexualised behaviour. School attempt to make this easier by:

- Building a positive, trusting relationships with children.
- Pupils have frequent opportunities to share their thoughts and opinions, and we encourage them to speak out.
- We listen to pupils respectfully and respond appropriately to what they say.
- Within the school we build a culture that challenges inappropriate behaviour. This can help children feel more confident that they will be supported if they raise concerns.
- Specialist staff make it easier for children to share anything they're worried about. All adults in the school are trained in Trauma Informed approaches and are aware of the importance of being emotionally available to young people.
- Staff will not promise confidentiality but use a best interest approach
- Having an anonymous online system for reporting concerns or incidents - https://forms.office.com/r/3i0z6a81n2

Talking with children about sexual behaviour

We endeavour to talk to children in an age-appropriate way about sexual behaviour, trust, consent, boundaries and responsibility. This helps them have a clearer understanding of what behaviour is, and is not, appropriate and why.

Pupils are used to having open discussions with adults, which can help them feel more comfortable about speaking out if they are worried or upset about anything.

We involve parents by sharing the topics we're discussing and making time to answer their questions.

Relationships and sex education

Lessons on relationships, sex and sexuality are part of the curriculum.

We use SoSafe / Coram Scarf to support with our teaching of RSE.

SoSafe has been developed to provide a visual step by step guide to relationships. Pupils learn about different groups of people they will meet during their lives and what is ok and not ok to do with different groups.

There is a pictorial guide which shows how relationships can begin and how we need to move step by step before we are in a relationship.

We also support this with Coram Scarf and this teaches pupils about friendships and boundaries. Each lesson links to the RSE standards and we select the lessons based on the individual pupil development.

Relationship Education is interwoven in all of PSHE, as being able to form healthy relationships is key.

Sex Education is taught in specific lessons as we need to allow parents/carers to withdraw if they wish from certain lessons.

Reactive Considerations[77]

Responding to Concerns about PSB or HSB

In the event of problematic or harmful sexual behaviour (PSB or HSB) school recognise that it is important to respond quickly, proportionately and appropriately. If staff have any concerns about a child's welfare, **they will act on them immediately,** rather than wait to be told. Where the report includes an online element, staff are aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. Staff are trained not to view or forward

[77] Additional information to support disclosures concerning sharing nudes semi-nudes is contained in section 5.2 of the main policy

illegal images of a child and when it is appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
When a pupil has displayed or experienced PSB, HSB or child-on-child abuse but they are not in immediate danger, concerns are shared in the following ways.

- School safeguarding and child protection procedures, including sharing concerns with the designated safeguarding lead (DSL). If possible, reports are managed with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible. There are four likely strategies to consider when managing any reports of sexual violence and/or sexual harassment. The DSL or DDSL will:
    - **Manage Internally**
    - **Early Help**
    - **Referrals to Children's Social Care**
    - **Report to the police as appropriate** (for example, if an allegation of rape, sexual assault or sexual offence is made). This should happen alongside making a referral to children's social care, following local authority guidelines.
- Contact the NSPCC helpline on 0808 800 5000 or by emailing help@nspcc.org.uk. Trained professionals will talk through your concerns with you and give you expert advice.
- Contact the Report Abuse in Education helpline on 0800 136 663 or by emailing help@nspcc.org.uk.
- Contact your local child protection services - 0300 123 2224
- An Early Help Assessment will also need to be submitted

Children and young people can also contact:

- Report Abuse in Education helpline to talk about being involved or witnessing incidents or sharing experiences of sexual abuse and harassment by calling 0800 136 663 or email help@nspcc.org.uk.
- Childline has produced age-appropriate information and advice for children and young people about sexual abuse, which includes information about HSB and child-on-child sexual abuse. Signpost children to Childline for support, or use some of these examples to help start a conversation. See Childline's information about sexual abuse for children and young people.
- Children can also contact Childline for free on 0800 1111 if they need to talk to a counsellor confidentially.
- The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

Risk assessment

When there has been a report of HSB, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, there's no definitive answer. Even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
The DSL will have to balance the victim's wishes against their duty to protect the victim and other children. The risk and needs assessment should consider:

- the victim, especially their protection, and support
- the anonymity of any children involved
- whether there may have been other victims
- the alleged perpetrator(s) and
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- supporting children who have witnessed sexual violence, especially rape and assault by penetration
- the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- school transport as part of your risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s)
- how to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed

Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) will be removed from any classes they share with the victim. The school will also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school site (including during any before or after school-based activities) and on transport to and from school, where appropriate. **These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).**

Working with parents and carers In most cases it will be appropriate to engage with the parents/carers of all young people involved. The exception is if there's reason to believe informing a parent or carer will put the child at additional risk. It is important to think carefully about what information you provide about the other child involved, and when. Make sure you work with relevant agencies to ensure your approach to information sharing is consistent. It's good practice to:

- Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress
- Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision

Discipline and the alleged perpetrator(s) The DSL should take the lead role in deciding the appropriate disciplinary action whilst other investigations are ongoing on a case-by-case basis. Support should be provided for all parties involved as appropriate. You should consider whether:

- Taking action would prejudice an investigation and/or subsequent prosecution - liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable/irrational for you to reach your own view about what happened

Where there is a police investigation there are likely to be 3 possible outcomes.
Conviction - Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils in the school. School will do it's best to ensure both the victim and perpetrator remain protected, especially from any bullying or harassment (including online).

Caution - If a child receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school as the victim, the school will be very clear as to their expectations regarding the perpetrator(s). This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.

No Further Action - Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. School will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

If there are delays in the criminal process, it will be important for the DSL to work closely with the police (and other agencies as required) whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s) – this is to make sure the school's actions don't jeopardise the police investigation. If you have any questions about the investigation, you should contact the police.

Useful Links
Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector:

- Contact Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations.

- NICE guidance contains information on developing interventions, working with families and carers and multi-agency working.
- The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework
- Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
- StopItNow - Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Allegations that may meet the harms 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 he or she 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

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 CEO where the headteacher is the subject of the allegation. In the case of an allegation against the CEO the Chair of the Board would act as case manager. The case manager will be identified at the earliest opportunity.
Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused 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[78]
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust

If in doubt, the case manager will seek views from the school's HR advisors and the designated officer at the local authority, as well as the police and 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 which 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[79]:

- 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

[78] making it clear that this is not a punishment and parents/carers have been consulted

[79] for all outlined steps advice will be sought from the designated officer, police and/or children's social care services, as appropriate and before actions are taken

- Discuss the allegation with the designated officer at the local authority (LADO)[80] **OR**
- The case manager may, on occasion, consider it necessary to involve the police *before* consulting the LADO[81]
- notify the LADO 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 relevant people. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements can be put in place.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **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 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
    - considering what other support is appropriate
    - signposting will be provided to support services commissioned by the school (Education Mutual) or the Trust (Education Partnership – EAP)
    - the employee will be advised to contact their union for further advice or support
- Inform the parents or carers of the child/children involved about the allegation as soon as possible. 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[82]
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

[80] 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

[81] if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence

[82] only in relation to their child – no information will be shared regarding the staff member

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered[83]
- Where an allegation is received relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children we will follow our safeguarding policies and procedures, including informing the LADO.

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 endeavor 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 endeavor 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 LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated
If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.
Individuals returning to work after suspension
If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports
If a report is:

[83] as part of the allegations management meeting or by liaising directly with the agency where necessary

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

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

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 which 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[84].

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

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

Concerns that do not meet the harm threshold

1. This appendix applies to all concerns[85] about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out above.

Concerns may arise through, for example:
- Suspicion
- Complaint
- 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.

2. Definition of low-level concerns
The term 'low-level' concern is any concern 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 LADO[86]

Examples of such behaviour could include[87]:
- 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
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils

3. Sharing low-level concerns
We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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
- Empowering staff to self-refer any situation which may cause concern, for example where a situation may be misinterpreted, might appear to compromising to others, or where they may have behaved in such a way that could be considered below the expected professional standards.

[84] We will consider how future investigations of a similar nature could be carried out without suspending the individual
[85] Including allegations
[86] It is good practice to consult the LADO if there is any doubt whether the threshold is met.
[87] but are not limited to

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Providing an anonymous reporting platform

4. 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 Trust's staff code of conduct. Consultations with the DSL or safeguarding team may inform actions and decision making.

5. Record keeping

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

- Kept confidential, held securely and comply with the DPA 2018 and 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 as above if the threshold is met
- Retained at least until the individual leaves employment at the school

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

6. **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 which would ordinarily be included in a reference, such as misconduct or poor performance

The Partnership Trust are committed to safeguarding and promoting the welfare of children at all stages of recruitment.

For All new staff (including volunteers and Governors/Trustees)
See TPT HR: Safer Recruitment Policy

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

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

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

We will obtain the DBS check for self-employed contractors.
We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
We will check the identity of all contractors and their staff on arrival at the school.
For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.
In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

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

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:

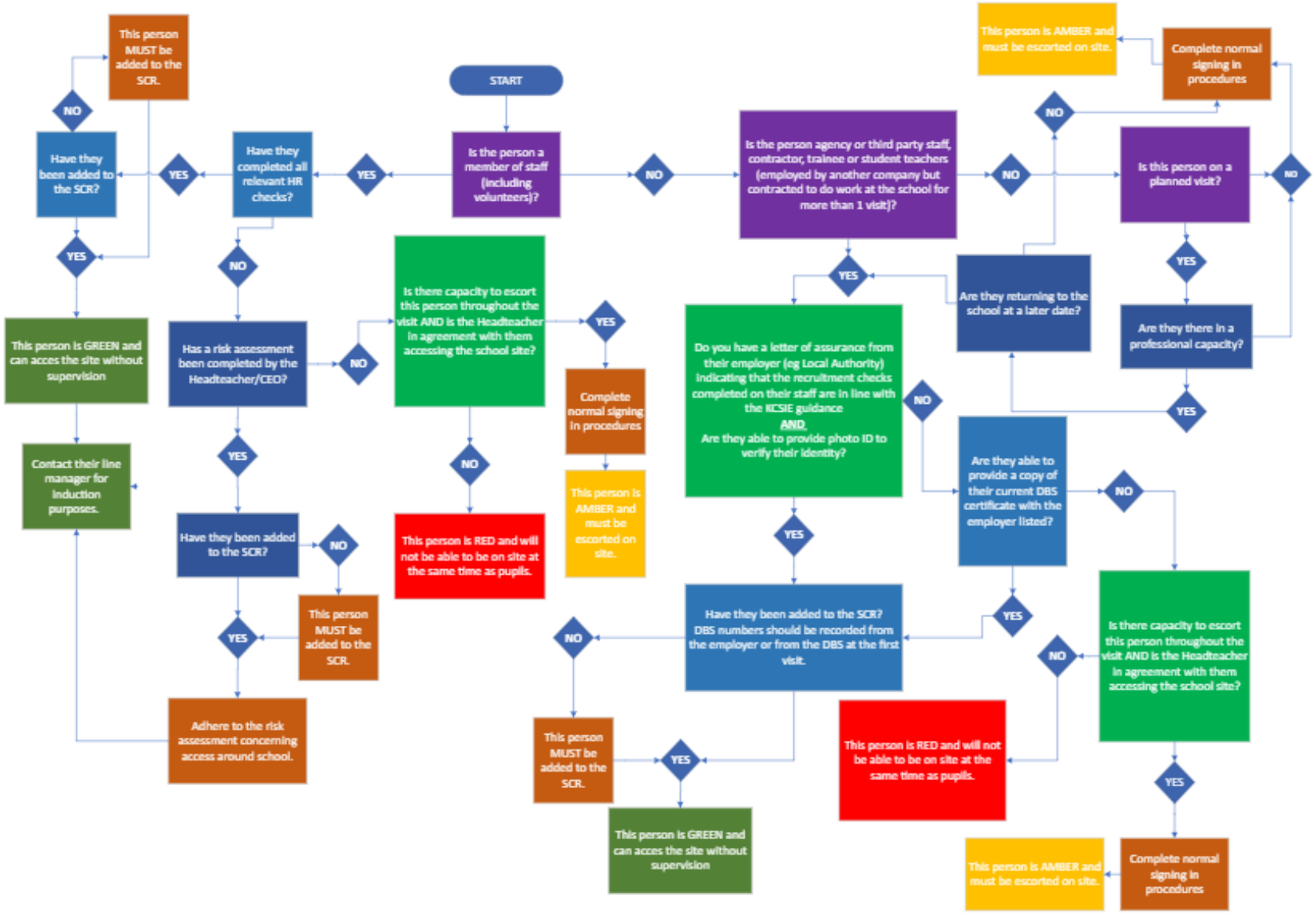
- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out[88]

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

For more information see the Safeguarding for Visitors flow chart below.

[88] Letter of assurance

Safeguarding for Visitors



APPENDIX 6: REPORTING OF SAFEGUARDING INCIDENTS BY SCHOOLS TO THE TRUST EXECUTIVE TEAM

To be read in conjunction with the school's Child Protection and Safeguarding Policies

At The Partnership Trust, the health, safety and well-being of every child is our priority. All staff, governors and volunteers are expected to share this commitment.

All school staff are trained in Child Protection, and children are made aware of the adults they can talk to if they have any concerns.

Each school adapts The Trust policy in relation to Child Protection and Safeguarding and has their own appointed Designated Safeguarding Lead and Deputy Designated Safeguarding Lead, details of which can be found on the school's website or obtained from the school office.

The Director for Safeguarding for The Partnership Trust is: Mrs Natalie Hanna who can be contacted via email on nhanna@thepartnershiptrust.com or by telephone on 01749838040.

The Designated Safeguarding Lead for The Partnership Trust Board is: Ms Dawn Wilde who can be contacted via the Trust Office on office@thepartnershiptrust.com or by telephone on 01761 404207.

The purpose of this document is to define safeguarding incidents that must be reported without delay to the Director for Safeguarding or the CEO, the manner in which that report should be made and who holds the responsibility for making the report. This procedure supplements those already set out within the school's policy for the reporting of safeguarding incidents.

Definitions:

All incidents that fall within the below definitions **must** be reported **without delay** and always within 24 hours.

Children:

- Any safeguarding concern that has resulted in **immediate** action being taken by social care
- Any safeguarding concern that was a result of the failure of adults within the school to ensure appropriate protection of the child

Staff:

- Any reported allegation against a member of staff resulting in a safeguarding concern from an adult (staff member/parent/member of the community)
- Any reported allegation/disclosure against a member of staff of a safeguarding nature by a child/young person

Method:

- using the summary section of the reporting form below.
- to nhanna@thepartnershiptrust.com and emassey@thepartnershiptrust.com

Responsibility:

- It is the responsibility of the Headteacher to ensure that the above procedure is followed.

It is the responsibility of the CEO to report incidents to the Trust Board Designated Safeguarding Lead/Ofsted.

Safeguarding
Confidential
The Partnership Trust

Name of school	Date	Time	Reported by
Summary of incident:			

TO BE COMPLETED DURING DISCUSSION WITH TRUST STAFF
Impact on the child/ren:
Causal Factors: **Lesson Learned:**
Action taken following the incident: **Action that will be taken to reduce risk:**
Summary from Director of Safeguarding: **Date**

The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

If you have concerns about a child or young person in BANES

If a child is at immediate risk call the POLICE	**Call the POLICE on 999**	
To make an URGENT referral (i.e., a child is likely to suffer or is suffering significant harm)	If you think a child is in immediate danger please call our Emergency Duty Team on **01454 61 51 65**	
To make a NON-URGENT referral, complete an Early Help Assessment and send to	Call our Children's Social Work Services on **01225 39 61 11** or **01225 47 79 29** (weekdays, 8.30am to 5pm, except Fridays when we're closed from 4.30pm)	
To raise concerns or ask for advice about radicalisation	Phone PREVENT DUTY on 01278 647466 or Email PreventSW@avonandsomerset.police.uk	
To liaise with the specialist Safeguarding Police unit	Phone the Lighthouse Safeguarding on 01278 649228 Email PreventSW@avonandsomerset.police.uk	
DSL Consultation Line 0300 123 3078	**Early Help Hub** **01225 395448**	**Critical Incident Support** EPS SSE 01823 357000

If you have concerns about a professional working with a child

To raise concerns and ask for guidance in relation to the conduct of someone who works with children	**Local Authority Designated Officer (LADO) Victoria Harlin** **01225 396810**

For information and guidance relating to safeguarding practice, policy and procedures

Education Safeguarding Service	Bath & North East Somerset Community Safety & Safeguarding Partnership Civic Centre, Market walk Keynsham BS31 1FS
Child sexual exploitation & child criminal exploitation	**Operation Topaz (Avon and Somerset Police)** www.avonandsomerset.police.uk/forms/vul
Child Missing from Education	Attendance and Welfare Support Service | The HUB

Children affected by Forced Marriage	**Forced Marriage Unit** Phone 020 7008 0151 Email fmu@fco.gov.uk
Online Safety Advice	**Professional Online Safeguarding Helpline** Phone 0344 381 4772 Email helpline@saferinternet.org.uk
Reporting online sexual abuse and grooming	**Child Exploitation and Online Protection Command** https://www.ceop.police.uk/ceop-reporting/
FGM advice	**NSPCC FGM Helpline** Phone 0800 028 3550 Email fgmhelp@nspcc.org.uk
Domestic Abuse Helpline	**Phone 0800 6949999**
Young Carers – advice and support	**Phone 0300 123 2224** **Email YoungCarersmailbox@somerset.gov.uk**
Whistleblowing professional policy	**NSPCC Whistleblowing hotline** Phone 0800 028 0285 Email help@nspcc.org.uk
Primary Mental Health Advice (CAMHS)	Bath & NE Somerset | Oxford Health CAMHS

If you have concerns about a child or young person in B&NES

If a child is at immediate risk call the POLICE	**Call the POLICE on 999**
To make an URGENT referral (i.e., a child or adult is likely to suffer or is suffering significant harm)	Phone Emergency Duty Team (Out of Hours) 01454615165 Phone 01225 396312 (child) / 01225 394200 (adult) or report online Concerned about a child or young person (bathnes.gov.uk) Reporting a Concern (bathnes.gov.uk)

To make a NON-URGENT referral, complete an Early Help Assessment and send to	Phone 01225 395021 (child) or 01225 394200 (adult) for more information Email: ChildCare_Duty@bathnes.gov.uk

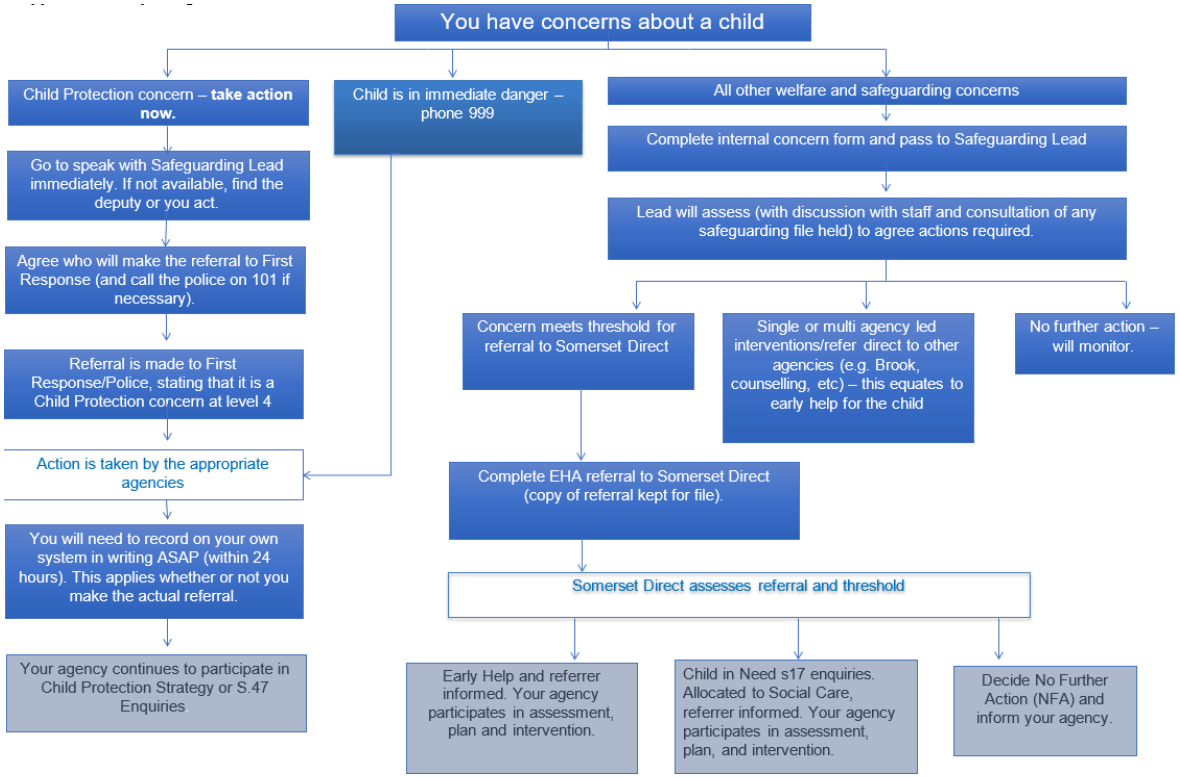
If you have concerns about a professional working with a child

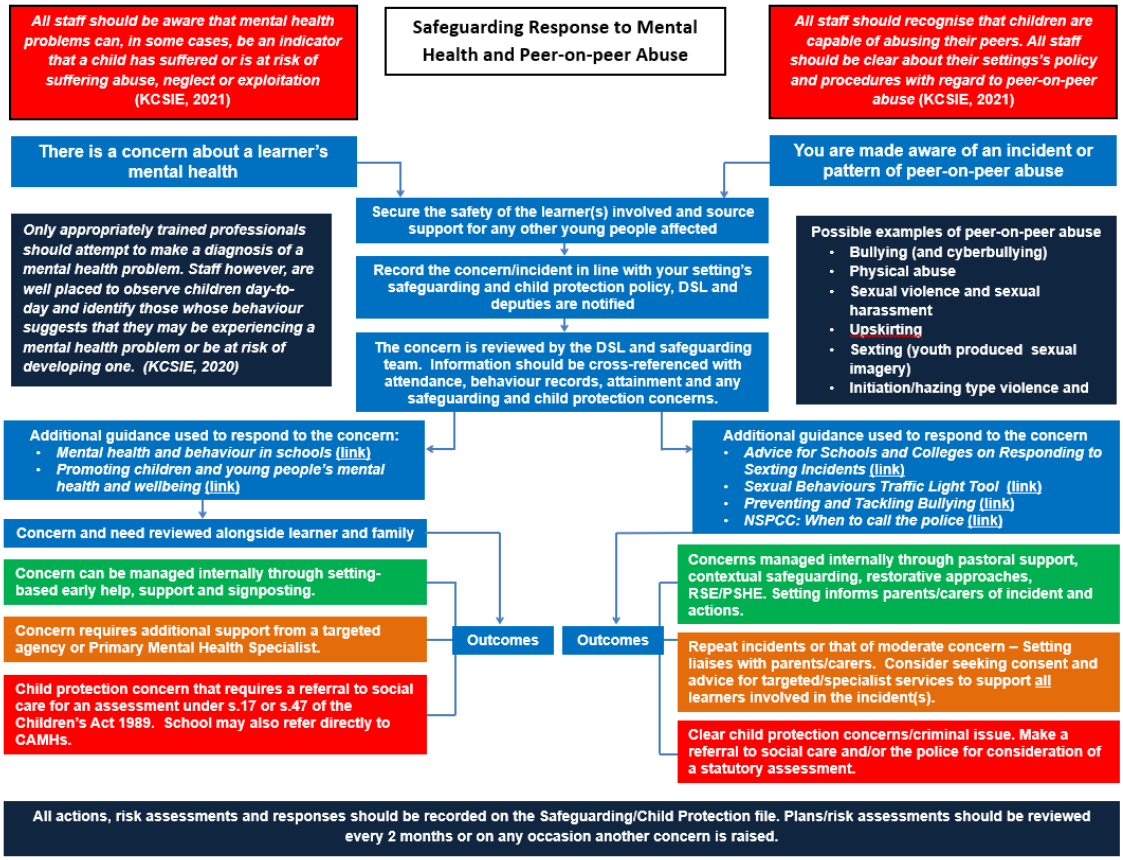
To raise concerns and ask for guidance in relation to the conduct of someone who works with children	**Local Authority Designated Officer (LADO) Local Authority Designated Officer (LADO)** **Victoria Harlin** **01225 396810**

For information and guidance relating to safeguarding practice, policy and procedures

Attendance and Welfare Support Service	**Julia Morris** 01225 394241 AWSS@bathnes.gov.uk
Child sexual exploitation & child criminal exploitation	**Operation Topaz (Avon and Somerset Police)** www.avonandsomerset.police.uk/forms/vul
Child Missing from Education	**A&WSS** 01225 394241 AWSS@bathnes.gov.uk
Mental Health Advice (CAMHS)	Mental Health Support Team | Oxford Health CAMHSOxford Health CAMHS

APPENDIX 9: VISUAL SAFEGUARDING PROTOCOLS





APPENDIX 10: DIGITAL SAFETY

Filtering and monitoring

Schools can use the department's 'plan technology for your school service' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

For all school the following guidance supports appropriate filtering and monitoring at school level.

- Annually: Technical and digital standards checklist - completed with support of school's IT provider at start of academic year.
- The standards checklist should be completed 3 times a year by the DSL/SLT in collaboration with the IT service provider and using the The Filtering and Monitoring Checklist Register provided by safer internet.org.uk.
- Schools should complete termly checks of their filtering using the link provided by swgfl; Test Your Internet Filter | SWGfL Test Filtering

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Information security and access management

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance on e-security is available from the National Education Network. In addition, schools and colleges should consider taking appropriate action to meet the Cyber security standards for schools and colleges which were developed to help them improve their resilience against cyber-attacks. Broader guidance on cyber security including considerations for governors and trustees can be found at National Cyber Security Centre – NCSC.

Amendments to the policy 15.07.25

Section	Amendment	Page
Main Front Sheet	Paragraph added to clarify updates may be published following further guidance being released	1
Contents		
Legislation and statutory guidance	Updated the date of KCSIE	5
4.5 The designated teacher	Updated the role of the virtual head to include children in kinship care.	11
4.6 Mental Health and Well-being	Removal of the deadline date for Mental Health Lead – All schools should now have a named lead.	11
5.2 If a child makes a disclosure	Change of text colour for clarity around dos and don'ts	12
7.1 The 4 key categories of risk	Additions to the bullet point 47 to include misinformation, disinformation and conspiracy theories	18
APPENDIX 1: Types of abuse, neglect and exploitation	Link removed as no longer live and new link added.	
APPENDIX 2: Pupils Accessing Alternative Provision	Updated to reflect current guidance – policy available if required	
APPENDIX 3: HSB	Additional bullet points added around the Lucy Faithfull Foundation's links and support.	27&29