A collaboration of schools which enhances the educational experiences and outcomes for children, maximising the benefits of working together, whilst maintaining the individual culture and ethos of each individual school

Child Protection and Safeguarding Policy (including allegations against staff and low level concerns)

The Piggott School: Secondary Phase

Author:	DSL/Lead Governance Professional
Approver:	Curriculum Committee
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Next review:	September 2027 unless there are earlier statutory or guidance changes
Category of policy:	Trust Board

Changes history

Version:	Date:	Amended by:	Substantive changes:	Purpose:
1			New trust policy	
2	September 2025	Lead Governance Professional	New sections on intimate care, operation encompass and alternative provision	To reflect KCSIE 2025 and to reflect our practice
3.	November	Lead Governance	New sections on equality & sport, school premises and	To reflect KCSIE 2026,

	2026	Professional	pupils with a medical condition. Section on gender questioning pupils has been re-written. Changes to other sections as required by KCSIE 2026. Inclusion of information sharing duty.	revised Working together to Safeguard Children, the Crime and Policing Act 2026 and Section16LA of the Children Act 2004

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Mr David Thatcher (Assistant Headteacher)	safeguarding@piggottschool.org 01189 402357
Deputy DSL's	Mrs Jo Colby (Safeguarding Officer) Mrs Rebecca Kenneally (Head of KS3) Ms Karen Thornton (Assistant Headteacher) Mrs Emily Winter (Assistant Headteacher) Miss Lucy Reynolds (Assistant Headteacher) from January 2026	safeguarding@piggottschool.org 01189 402357

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Local authority designated officer (LADO)	Liston Williams	LADO@wokingham.gov.uk
Designated safeguarding governor	Mrs Emma Kennett	C/o Mrs Rebecca Marr – Governance Professional MarrR@piggottschool.org 01189 402357
Designated safeguarding trustee	Dr. Alison Silby	C/o Mrs Rebecca Marr – Governance Professional marrr@agapetrust.co.uk 01189 402357
Channel helpline		020 7340 7264
Referral and Assessment Team – WBC Children's Social Care		triage@wokingham.gov.uk 01189 088002
Berkshire West Safeguarding Children Partnership (Brighter futures for children)	DSL Network – chaired by R Blyth	www.berkshirewestsafeguardingchildrenpartnership.org.uk
Operation Encompass TVP- information sharing	Secure communication via email to Headteacher or the DSL	
ARC information and Counselling Service		35 Reading Road, Wokingham, Berkshire, RG41 1EG www.arcweb.org.uk
Building Resilience in Young Minds		info@briym.co.uk

1. Aims

The school is committed to creating and maintaining a safe learning environment for children and young people, identifying where there are child welfare concerns and taking action to address them, in partnership with other agencies. This policy reflects the policies of the Local Safeguarding Children Board (LSCB) who are responsible for developing policies and procedures for safeguarding

and promoting the welfare of children in the area of the authority, including policies and procedures in relation to:

- The action to be taken where there are concerns about a child's safety or welfare, including thresholds for intervention
- Training of persons who work with children or in services affecting the safety and welfare of children
- Recruitment and supervision of persons who work with children
- Investigation of allegations concerning persons who work with children
- Safety and welfare of children who are privately fostered
- Co-operation with neighbouring children's services authorities and their Board partners

The school aims to ensure that:

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

2. Legislation and statutory guidance

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

This policy is also based on the following legislation:

- 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
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- The information sharing statutory guidance DfE stat guidance template
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees, governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- Crime and Policing Act 2026, which determines when a volunteer is classified as participating in regulated activity
- Working together to improve school attendance Working together to improve school attendance (applies from 19 August 2024)

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

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Safeguarding is preventative and proactive.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm

that occurs inside or outside the home, including online. Child Protection is intervention and reactive.

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

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

Making or sharing of nudes and semi-nudes is the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'

Children includes everyone under the age of 18.

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 (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

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

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

Data protection laws' refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see sections 13 and 14)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 16)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

We have carefully considered the impact of this policy and the possible implications for members of our school community with protected characteristics as part of our commitment to meet the public sector equality duty requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. If you feel you or another member of our school community has or may be negatively impacted by this policy please contact our DSL.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, members, trustees and governors in the trust/school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships and sex education and health education (PSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent

- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff of The Piggott School and the Agape Trust Central Team will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), and review this guidance at least annually. All staff are recommended to read and have an understanding of the whole of KCSIE.
- Staff will sign an annual register to confirm that they have received the statutory training, adhere to the staff code of conduct and that they have read and understood the Keeping Children Safe in Education 2026 document – Part 1 and Annex B.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe environment in which children can learn
- Identify children who may benefit from Family Help.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Determine how best to build trusted relationships which facilitate communication with children and young people.

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the designated governor and trustee for safeguarding, the behaviour policy, the acceptable internet usage policy, the information security policy, the internet access policy and the safeguarding response to children who go missing from education

  Community-based Family Help assessments including the criteria, and level of need, for when a case should be referred to:

  - Family Help support and services (targeted early help level and statutory services)
  - Local Authority Children's social care for assessment and statutory services under S.47 of the Children Act 1989 (reasonable cause to suspect a child is suffering, or is likely to

suffer, significant harm), S.31 (care and supervision orders) and S.20 (duty to accommodate a child)

- And the procedures and processes for cases relating to abuse, neglect and exploitation of children, children managed within the youth secure estate and disabled children
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- The fact that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful
- That a child and their family may be experiencing multiple needs at the same time
- That children can abuse other children (often referred to as child-on-child abuse), that it can happen both inside and outside of school and online and that timely, evidence based support can be key to preventing children from going on to commit abuse or violence.
- That mental health problems can, in some cases, develop into safeguarding concerns.
- What to look for to identify children who need help or protection

Appendix 2 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the Senior Leadership Team. Our DSL is Mr David Thatcher (Assistant Headteacher). The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can be contacted out of hours on either of ThatcherD@piggottschool.org or safeguarding@piggottschool.org.

To ensure continuity of safeguarding responsibilities, when the DSL is absent, the DSL deputies – Mrs Jo Colby (Safeguarding Officer), Mrs Rebecca Kenneally (Head of KS3), Ms Karen Thornton (Assistant Headteacher) and Emily Winter (Assistant Headteacher) will act as cover.

If the rare occasion occurs whereby the DSL and deputies are not available, Alex MacLeod, Deputy Headteacher will act as cover.

We also have a confidential shared mailbox to ensure continuity of safeguarding responsibilities (safeguarding@piggottschool.org).

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

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

The DSL will also:

- Ensure robust safeguarding arrangements are in place and embedded in the daily life and practice of the school
- Ensure a structured procedure within the school, which will be followed in cases of suspected abuse
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Refer cases of suspected abuse or allegations to the relevant investigating agencies; Concerns about a child not involving allegations of abuse by a member of staff should be referred to the WBC Referral and Assessment Team at WBC Social Care – see page 4 for contact details.

The DSL is not responsible for dealing with allegations made against members of staff. This is the responsibility of the Headteacher who will inform the Local Authority Designated Officer (LADO).

If the Headteacher is unavailable the DSL or Deputy Headteachers should be made aware of the allegation and they will deputise for the Headteacher until the Headteacher becomes available and will resume responsibility.

- Act as a source of support, advice and expertise within the school when deciding whether to make a referral by liaising with relevant agencies;
- Liaise with the Headteacher to inform her of any issues and ongoing investigations. The DSL will ensure there is always cover for this role
- Ensure that a systematic means of monitoring children known or thought to be at risk of harm, is in place and that the school contributes to assessments of need and supports multi agency plans for those children
- Work with the Trust Board to ensure that the School's Child Protection and Safeguarding Policy is updated and reviewed annually
- Ensure that, in order to avoid conflict later, parents are aware that referrals may be made and of the role of the School
- Share information effectively regarding welfare, safeguarding and child protection issues that may affect attendance, engagement or achievement within school
- Ensure child protection files are kept up to date, stored securely and confidentially
- Ensure that when children leave the school, their Child Protection File is discussed as soon as possible with the DSL at the new school. Consider whether to share any additional information with the new setting in advance of the pupil leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to ensure the right support is put in place
- Understand the importance of information sharing, both within the school, and with other schools including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and apply relevant data protection laws
- Make sure that the Child Protection File is transferred separately from the main pupil file
- Where the new school is not known, alerting the Education Welfare Officer at Wokingham Borough council (WBC) so that the child's name can be included on the data base for CME
- Cascade safeguarding advice and guidance issued by the Local Safeguarding Children Board (LSCB)
- Attend training for DSLs in Child Protection training and complete a refresher every 2 years
- Ensure staff receive appropriate safeguarding training annually. Safeguarding is a regular agenda item on all staff meetings to ensure that up to date information regarding procedures such as the Prevent strategy are shared and discussed in open forums.

Mr David Thatcher is also our Prevent lead. Our Prevent lead ensures staff, trustees and governors have appropriate Prevent training and induction.

5.3 The Trust Board/Local Governing Committee

The respective role and responsibilities of the Trust Board and The Local Governing Committee in relation to safeguarding are set out in the scheme of delegation.

The Trust Board/Local Governing Committee will:

- Ensure that all members of the school community including the Designated Safeguarding Governor, Designated Safeguarding Trustee, Designated Safeguarding Lead and all members of the school community have appropriate safeguarding procedures in place should they choose to raise safeguarding issues or concerns on any level
- Secure an ethos within the school community where all adults feel confident, competent, comfortable and supported to draw safeguarding issues to the attention of the Headteacher, DSL or the Designated Safeguarding Governor or Trustee and are able to pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children
- Ensure robust safeguarding arrangements are in place and embedded in the daily life and practice of the school
- Ensure that procedures are in place to deal with allegations of abuse against staff and volunteers
- Ensure the school has a behaviour policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying) and a staff code of conduct
- Ensure sufficient trustees and governors are trained in safer recruitment practices so that appointments to the senior leadership team can be adequately supported
- Ensure appropriate safer recruitment policies in accordance with KCSIE are in place, embedded and effective
- Ensure sufficient trustees and governors are trained in safer recruitment practices that appointments to the senior leadership team can be adequately supported
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Review and approve this policy at least annually ensuring it complies with the law, is effective, is publicly available and hold the headteacher to account for its implementation
- Ensure there are appropriate safeguarding arrangements in place to respond to children who are absent from education
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link trustee and link governor to monitor the effectiveness of this policy in conjunction with the Trust Board and Local Governing Committee. These are always different persons from the DSL.
- Ensure child protection files are maintained in accordance with Annex B of KCSIE

- Safeguard children by protecting their personal information and ensuring the school has appropriate cyber security systems in place
- Where reasonably possible, ensure the school holds more than one emergency contact number for each pupil
- Ensure all staff, trustees and governors undergo safeguarding and child protection training, including online safety, on induction and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness annually keeping a written record of the check. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Considering the number of and age range of the children in the school, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
    - Reviewing the Generative AI: product safety expectations https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 4 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Chair of the Local Governing Committee will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate). The Chair of Trustees will act as the 'case manager' in the event an allegation of abuse is made against the CEO, where appropriate. (see appendix 4 – allegations against staff and low level concern procedures)

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

Section 25.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The Headteacher and SLT

The Headteacher and SLT are responsible for the implementation of this policy, including:

- Ensuring that staff, including temporary staff, and volunteers (save for members of the Central Trust Team where this responsibility lies with the CEO):
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Ensure that all members of the school community including the Designated Safeguarding Governor, Designated Safeguarding Lead and all members of the school community have appropriate safeguarding procedures in place should they choose to raise safeguarding issues or concerns on any level
- Secure an ethos within the school community where all adults feel confident, competent, comfortable and supported to draw safeguarding issues to the attention of the Headteacher, DSL or the Designated Safeguarding Governor and are able to pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- Ensure children know that there are adults in the school whom they can approach if they are worried
- Include opportunities in the Personal, Social and Health Education (PSHE) and RSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse
- Include opportunities for learning during the Tutor Time curriculum through assemblies, Thought for the Week, British Values and time for personal growth and spirituality
- Take all reasonable measures to ensure risks of harm to children's welfare are minimised

- Promote pupil health and safety
- Promote safe practice and challenge unsafe practice
- Put in place and promote robust anti-bullying, including cyber bullying, strategies
- Meet the health needs of children with medical conditions
- Provide first aid
- Maximise school security
- Tackle drugs and substance misuse
- Work with all agencies with regard to missing children, anti-social behaviour/gang activity and violence/knife crime in the community
- Ensure staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies
- Undertake safer recruitment training in order to comply with the statutory requirement to have a trained person on every recruitment panel
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 4 – allegations against staff and low level concern procedures)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

5.5 CEO

The CEO is responsible for the implementation of this policy for members of the Central Trust Team, including:

- Ensuring that staff including temporary staff and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer of the Central Trust Team, where appropriate (see appendix 4 – allegations against staff and low level concern procedures)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the Trust DSLs on this.

6. Confidentiality & sharing of information

Where there is a child protection concern it will be passed immediately to the DSL who will contact the Local Authority Designated Officer (LADO) if appropriate – see page 3 for contact details.

The parents/carers of the child should be informed immediately unless it is felt that this would not be in the best interests of the child, would place them at further risk or where it is believed a crime may have been committed.

The Headteacher, DSL or Deputy DSL's will disclose personal information about a pupil, including the level of involvement of other agencies, to other members of staff only on a 'need-to-know' basis.

Staff should note that:

- Under Section 16LA of the Children Act 2004, the school has a statutory duty to share information with other relevant organisations if we consider that we hold information that is relevant to safeguarding or promoting a child's welfare, or if we receive a request for relevant information from another organisation/practitioner
- We will share information with other organisations/practitioners if it is considered that sharing may help the recipient's relevant functions, including assessing need, making a decision, providing support or taking action to safeguard and promote the welfare of a child.
- 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
- Information sharing with practitioners, local agencies, including social care and our safeguarding partners, is vital in identifying and tackling all forms of abuse, neglect, and exploitation and in promoting childrens' welfare, including their educational outcomes. Our staff have clear powers to share, hold and use information for these purposes.
- Thresholds for sharing: The duty to share information is not limited to situations where a child is in immediate danger or meets child protection thresholds. Relevant information must also be shared where it is relevant to safeguarding and promoting a child's welfare, including where concerns relate to early help, prevention and unmet need.
- In extremely limited circumstances, we will not share information where we consider that doing so would be more detrimental to the child than not sharing. Examples of the extremely limited circumstances include:
    - That child being placed at immediate risk of harm by the information being shared
    - Interfering with a police investigation, such that the consequence is likely to be of greater detriment to the child, including placing another child at increased risk of harm
    - Contravention of the Family Procedure Rules, or order of the Family Court or Family Division of the High Court
- Any decision not to share information to avoid greater detriment to the child will be rare, and will be carefully considered, with the welfare of the child central to any judgement.
- The data protection laws do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Data protection must not be treated as a reason to withhold information where the statutory duty applies.
- Consent and confidentiality: When sharing information for safeguarding purposes under the Section 16LA statutory duty, the common law duty of confidentiality does not apply. The statutory guidance warns against seeking consent to share information if the statutory duty dictates it must

be shared, as this presents children and families with a 'false choice.' Instead, the school will identify the appropriate lawful basis from the outset and will explain what will happen rather than seeking permission where consent is not required or would be inappropriate for safeguarding purposes, unless doing so would place the child at greater risk.

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests and would conflict with our statutory duty.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, but staff must recognise that the statutory duty to share relevant information overrides a victim's request for complete confidentiality
    - The DSL will have to balance the victim's wishes against their legal duty to protect the victim and other pupils and staff. Under this guidance, a decision to withhold information should only occur in extremely limited circumstances when sharing it would be more detrimental to the child than not sharing it.
- The DSL should consider that:
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- We will only use information received by the school under the information sharing duty for the specified purposes.

Further details on information sharing can be found:

- in Working together to safeguard children - GOV.UK which includes a myth-busting guide to information sharing,
- at Information sharing advice for safeguarding practitioners - GOV.UK the seven golden rules for sharing information will be especially useful,
- the Information Commissioner's Office (ICO) guide Sharing information to safeguard children and young people in the education sector in the UK | ICO which is intended to help practitioners to feel confident to share personal information for safeguarding purposes, and

› in Data protection in schools - Guidance - GOV.UK Guidance to support schools with data protection activity, including compliance with the UK GDPR.

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

Confidentiality is also addressed in this policy with respect to record-keeping in section 26 and in our associated allegations of abuse against staff procedures.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for support before statutory intervention (including from universal services and community-based Early Help or the targeted early help level of Family Help) for a child who:

- Is disabled (or has medical conditions with specific needs)
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is pregnant or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours including misogyny
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

- Has a parent or carer in custody or is affected by parental offending
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school

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

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

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

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

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

Staff may want to refer to the GOV.UK webpage for reporting child abuse to your local council:

https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

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
- Write a full record of the disclosure or observation, completing the incident form on CPOMS – dated, timed, using factual language to record the information clearly and coherently.
- Immediately inform the DSL or one of the Deputy DSLs unless the disclosure has been made to them, following agreed procedures and referrals as appropriate.
- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

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

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

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2 of this policy.

Any teacher who either:

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

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

The duty applies to all persons employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. Please refer to the Home Office and Department for Education's procedural information for full details: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

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

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

Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures including completing an incident form on CPOMS.

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

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

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

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

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

Community-based early help assessment

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

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

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

Early Help procedures for Wokingham Brough Council can be found at:

https://www.wokingham.gov.uk/children-families-and-young-people/children-and-families/child-protection-and-family-support/early-help-service

Referral

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

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

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

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

Details of the local escalation process can be found:

https://proceduresonline.com/berks/wokingham/p_conflict_res.html

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL and Prevent Lead David Thatcher or a DDSL.

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

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

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

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

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

7.6 If you have a concern about mental health

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

Schools have 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. This could be significant changes in behaviour, ongoing difficulties sleeping, withdrawing from social situations, suicidal ideation, not wanting to do things they usually like, and physical signs of self-harm or neglecting themselves.

A concern regarding challenged mental health should be treated as a safeguarding concern and staff should refer the concern in accordance with the school policy (section 7.4). The concern will be assessed, and a support plan will be determined for the pupil. Where necessary, specialist advice and guidance will be sought. The school recognises that early intervention is key to securing

positive mental health and the school has multiple tiers of pastoral care and pathways available for students who required intervention or support.

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

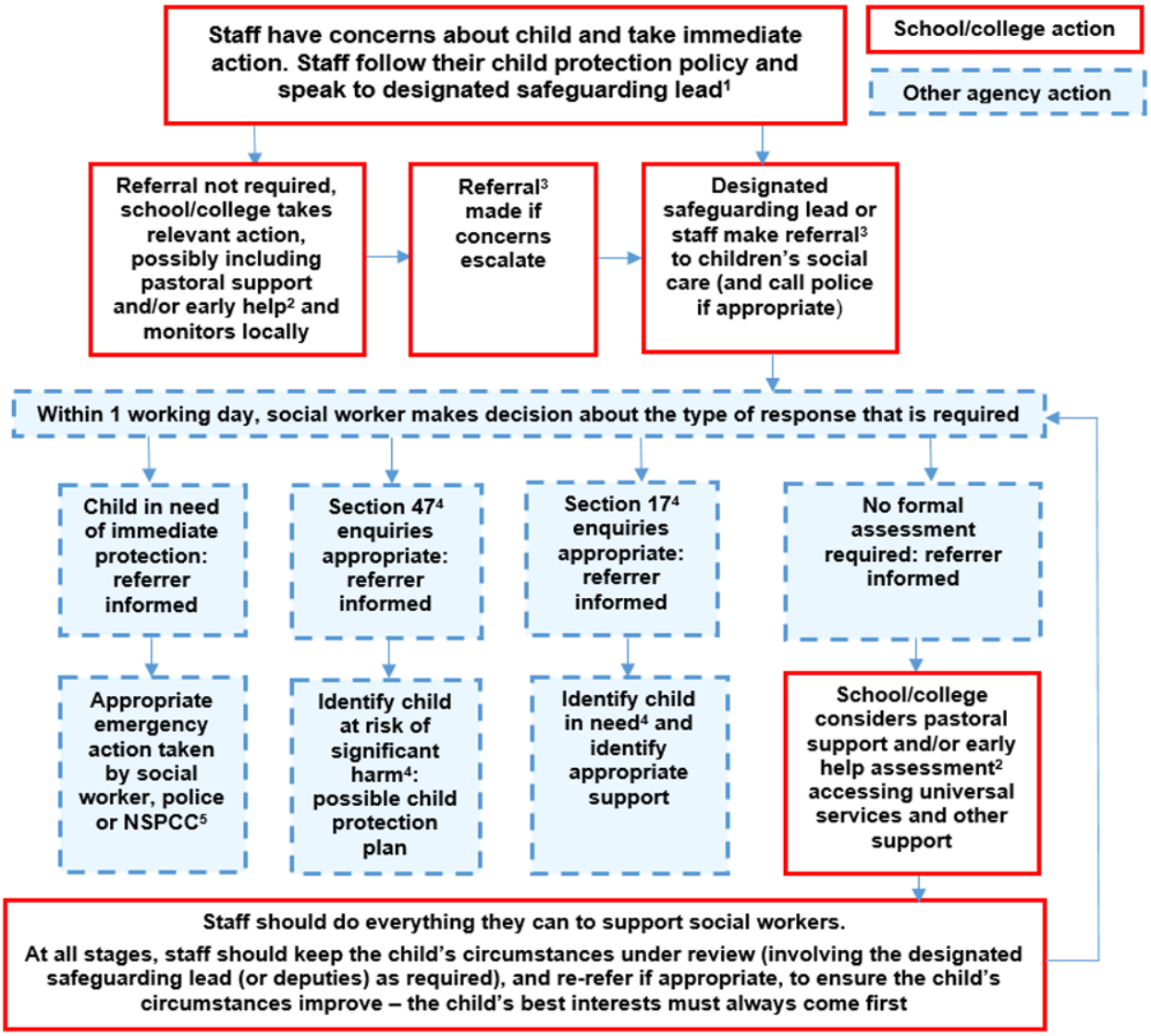
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Where support is needed, the designated safeguarding lead (or a deputy) will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

There is an ongoing commitment in the school to educate young people in recognising how to secure positive mental health and how to build resilience and wellbeing through lifestyle and healthy choices. Where students require additional support, the school will intervene to ensure the very best outcomes for a young person and their family. Interventions offered will be evidenced as safe and effective and appropriate for the need and phase of education. A range of local available support to meet the needs of children including, from our Mental Health Support Team (MHST) and early support hubs and young futures hubs ,where available, will be considered.

For more information refer to the Department for Education guidance on mental health and behaviour in schools and Promoting children and young people's mental health and wellbeing - GOV.UK.

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



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

If you have concerns about a member of staff (including a trainee, teacher, supply teacher, volunteer or contractor) or an allegation is made about a member of staff (including a trainee teacher, supply teacher, volunteer or contractor) or posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher or a governor, speak to the Chair of the Local Governing Committee. The Headteacher/Chair of the Local Governing Committee will then follow the procedures set out in appendix 4, if appropriate and will consider a referral to the LADO.

If you have concern about a member of the Central Trust Team staff (including a volunteer or contractor) or an allegation is made about a member of the Central Trust staff (including a volunteer or contractor) or posing a risk of harm to children, speak to the CEO as soon as possible. If the concerns/allegations are about the CEO or a trustee, speak to the Chair of the Trust Board.

The CEO/Chair of the Trust Board will then follow the procedures set out in appendix 4, if appropriate and will consider a referral to the LADO.

If you have concerns about the Chair of the Local Governing Committee or the Chair of the Trust Board or an allegation is made about the Chair of the Local Governing Committee or the Chair of the Trust Board posing a risk of harm to children, speak to the CEO as soon as possible. The CEO will then follow the procedures set out in the allegations of abuse against staff procedures, if appropriate and will consider a referral to the LADO.

Where you believe there is a conflict of interest in reporting a concern or allegation to the named person above, report it directly to the local authority designated officer (LADO).

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

7.8 Allegations of abuse made against other pupils

All references to Child-on-child abuse includes harassment and violence.

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

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

We will be alert to when children might be at highest risk around the school day (for example immediately after school).

It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim. Behaviour may be intimate or non-intimate.

Children should feel encouraged and empowered to report all behaviour that may be perceived to be child-on child abuse. It is important that children understand that the law is there to protect them rather than criminalise them. Schools must understand intra familial harms and respond with any necessary support for siblings following incidents.

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

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Involves pupils being forced to use drugs or alcohol

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

See appendix 2 for more information about child-on-child abuse.

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

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

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

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

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

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

To achieve this, we will:

- Take all allegations of child-on-child abuse seriously and respond in accordance to the safeguarding and behaviour policies
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Empower young people to be courageous advocates for acceptable conduct and to report all concerns.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously and they will be supported following the disclosure

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment.
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or person who made the report is in need of help or may have been abused by someone else, or the report may have been a cry for help. In such circumstances, a referral to local authority's social care may be appropriate
- Shown to be deliberately false or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it in line with the school's behaviour policy

7.9 Making and sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual making and sharing of nude or semi-nude visual content including those that have been digitally altered or wholly generated using artificial intelligence 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 and include in your CPOMS incident form)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the DSL or DDSLs depending on the severity of the incident calling 999, 101/reporting online or contacting our local police community support officer.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 24 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making and sharing of nudes and semi-nudes as part of our RSE and PSHE curriculum and assembly programmes. Teaching covers the following in relation to the making and sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

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

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding

- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

We recognise that the school plays a significant part in the prevention of harm to our children by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. We recognise that children who are abused or witness violence may feel helplessness, humiliation and some sense of blame and that their behaviour may be challenging or defiant, or they may be withdrawn. We appreciate that school may be the only stable, secure and predictable element in the lives of children at risk.

We will endeavour to support our pupils through:

- Putting systems in place for pupils to confidently report abuse.
- Empowering young people to be courageous advocates for acceptable conduct and to report all concerns.
- Ensuring our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Ensuring that all pupils know there is an adult in the school whom they can approach if they are worried or in difficulty
- Providing 1:1 nurture work with pastoral staff and the opportunity to talk to an adult of their choice at any time
- Ensuring that children who may be LGBTQIA+ have a trusted adult who they can be open with.
- Taking the child's wishes and feelings into account when determining what action to take and what services to provide.
- Making it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Making it clear pupils will be supported following disclosure
- Regularly consulting with our young people e.g. through questionnaires, participation in anti-bullying assemblies and presentations, monitor playground incidents
- Promoting safeguarding across the curriculum, including PSHCE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help
- Implementing the behaviour policy which is aimed at supporting vulnerable pupils, ensure pupils know what behaviour is acceptable and that they understand that sanctions will apply along with restorative justice and forgiveness as appropriate
- Ensuring that, where a pupil subject to a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed

- Ensuring that all staff are aware of the increased risk of vulnerability and additional challenge for children with special educational needs
- Recognise that some pupils may have difficulties communicating orally and that appropriate alternative and augmentative communication (AAC) and other communication methods should be used to enable the voice of the child to be heard and to reduce their vulnerability.

Pupils should report concerns to any member of staff.

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers, trustees and governors including robust tracking systems of activity and transparency of practice
- Review the effectiveness of filtering and monitoring systems at least annually by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT Team. This will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of the review will be kept. Our Local Governing Committee will also monitor effectiveness annually.
- Ensure that the leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Adhere to and enforce a no mobile phone policy for pupils in KS3 and KS4 and set clear guidelines for the use of mobile phones for students in KS5, subject to where a phone is required as part of a pupil's reasonable adjustments and/or medical condition
- Consider any changes to, and implement, policy and practice as a result of wearable technology
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate. Our curriculum and pastoral care structure has mechanisms to identify, intervene in and escalate any concerns regarding the online activity of our young people.

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, for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including deepfakes) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example such as child-on-child pressure, commercial

advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images, including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If we feel our pupils, students or staff are at risk, we will make a report to the Anti-Phishing Working Group (https://apwg.org/).

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

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras unless there are exceptional circumstances and there is no school device available. For example, an exceptional circumstance may arise when pictures/videos are taken to showcase a pupil's performance. In these exceptional circumstances the pictures/videos should be uploaded to the school's network at the very earliest opportunity and then deleted from the personal device, ensuring that it has also been deleted from any cloud system on the personal device. Staff will also ensure that the relevant parental/student consents are in place for the taking of photos/recordings.
- Make all pupils, parents/carers, staff, volunteers, trustees 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

- Have a clear and sufficiently detailed policy which covers the taking and use of digital images and video of pupils and takes steps to ensure that it is understood and enforced. Particular care will be taken when images of pupils may pass beyond the direct control of the school and into the public domain, e.g. on the school website, social networking. Guidance will include reference to the storage and deletion of images of pupils, including the policy on the use of devices with a facility to store or transfer data to other locations (e.g. 'cloud' storage) to ensure the school is in line with ICO (Information Commission's Office) guidance
- Ensure that appropriate written permissions are obtained before any photographs or videos are used. Where parental permission has not been obtained, or it is known that a pupil should not be photographed or filmed, every reasonable effort should be made to ensure that a pupil's image is not recorded
- Make clear where the school chooses to allow the recording of images at events that images may only be recorded for personal use, can only be shared with immediate family and friends and not shared on social networking sites.
- Consider when taking part in events organised by other schools or organisations, what image guidelines should apply. For larger events it is reasonable to expect that specific image guidelines should be in place. Consideration should be given as to how those attending the event will be informed of the image guidelines that apply. Although the school will make reasonable efforts to safeguard the digital images of pupils, parents should be made aware that at some types of event it is not always realistic to strictly enforce image guidelines. The school cannot therefore be held accountable for the use of images taken by parents or members of the public at events.
- 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.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our behaviour policy (mobile phone use), acceptable internet usage and internet access policies which can be found on our website. The Piggott School - Statutory Information and Policies

8.1 Artificial intelligence (AI)

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

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

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Staff should be familiar with and adhere to the DfE guidance: Generative AI: product safety expectations and the Trust's AI policy.

9. Intimate care

Intimate care refers to any care that involves toileting, washing, changing, touching or carrying out an invasive procedure to children's intimate personal areas.

We will ensure that:

- Intimate care is carried out properly by staff, in line with any agreed plans
- The dignity, rights and wellbeing of every child are safeguarded
- Pupils who require intimate care are not discriminated against, in line with the Equality Act 2010
- Parents/carers are assured that staff are knowledgeable about intimate care and that the needs of their child are taken into account
- Staff carrying out intimate care work do so within guidelines (i.e. health and safety, manual handling, safeguarding protocols awareness) that protect themselves and the pupils involved

For children who need routine or occasional intimate care (e.g. for toileting or toileting accidents), parents/carers will be asked to sign a consent form. For children whose needs are more complex or who need particular support outside of what's covered in the permission form, an intimate care plan will be created in discussion with parents/carers.

If the school is unable to get in touch with parents/carers and an intimate care procedure urgently needs to be carried out, the procedure will be carried out to ensure the child is comfortable and the school will inform parents/carers afterwards.

Where an intimate care plan is required, it will be agreed in discussion between the school, parents/carers, the child (where possible) and any relevant health professionals.

The school will work with parents/carers and take their preferences on board to make the process of intimate care as comfortable as possible, dealing with needs sensitively and appropriately. Subject to their age and understanding, the preferences of the child will also be

taken into account. If there's doubt whether the child is able to make an informed choice, their parents/carers will be consulted.

The plan will be reviewed regularly, even if no changes are necessary, and updated regularly, as well as whenever there are changes to a pupil's needs.

Please see appendix 5 for the parent/carer consent form.

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

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

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

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

11. Equality Act 2010 and Sport

In any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa) the Equality Act 2010 does not apply. Separating children according to their biological sex in these circumstances is not discriminating unlawfully against them on the basis of their sex.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there will be no exceptions. We may also decide to adopt a policy of single-sex sports for reasons related to fairness.

Where there are no safety concerns and a child makes a request relating to how they participate, we will consider the request in light of the advice on "considering requests for support with social transition". We will take into account all relevant factors, including whether supporting social

transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

12. Regulations and safeguarding requirements relating to school premises

Toilets – We will provide separate toilets for boys and girls (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time).

We will not allow children into toilets designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for children who are questioning their gender.

If a gender-questioning child does not want to use the toilet designated for their biological sex, we will consider whether we can provide an alternative toilet facility, (for example a self-contained individual toilet), without compromising the provision of single-sex facilities. These alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child, or of any other children. We will keep a record of these situations, ensure they are communicated appropriately, and will review them regularly.

Where we have mixed-sex toilets in addition to single sex toilets, we will assess safeguarding risks. Mixed-sex toilets will be in individual, lockable rooms and open directly onto public areas (e.g. a corridor).

Changing Rooms - We will not allow our pupils to undress in front of a child of the opposite biological sex. Our changing accommodation will be suitable for our pupils, having regard to their age, numbers, and sex and any special requirements they may have and will be informed by our safeguarding obligations.

When responding to a request to support any degree of social transition, we will not allow a child access to changing rooms designated for the opposite sex. If a gender-questioning child does not want to use the changing rooms designated for their sex, we will consider whether we can provide an alternative changing facility without compromising the provision of single-sex facilities. This may be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time. These alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child or of any other children. We will keep a record of these situations, ensure they are communicated appropriately, and will review them regularly.

Overnight accommodation - we will not allow children to share overnight accommodation with a member of the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for children who are questioning their gender.

If a gender-questioning child does not want to use the overnight accommodation for their biological sex, we will consider whether we can provide an alternative sleeping arrangement (for example a suitable separate room). These alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child, or of any other children.

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

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral and communication support for these pupils dependent upon the pupil's needs. This includes access and support in the SEND Department and staff. Access to the 'Quiet Room' and the schools Pastoral & Behaviour Mentor, support from the KS3/4/5 Hubs and Pastoral Teams along with internal Early Help through mentoring, BRIYM and ARC.

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

14. Safeguarding pupils with a medical condition

If there has been an incident relating to the management of a child or young person's medical condition (including allergies) this would not in itself warrant a referral to local safeguarding partners. A safeguarding referral is only needed where an incident highlighted concern that the pupil might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about the pupil's medical condition is not provided to the school, or where the pupil is repeatedly sent to school without essential medication, thereby putting the pupil at risk.

15. Pupils with a social worker

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

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

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

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

16. Looked-after and previously looked-after children

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

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

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

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

As part of their role, the designated teacher will:

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

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

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

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

Gender questioning - We will not initiate any action where we suspect a pupil may be questioning their gender. If however a pupil or their families/carers has raised a request relating to social transition and we are supporting that request, we will:

- keep in mind that it is common for children to engage in activities that are less typically associated with their sex. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small

proportion may continue to question their gender and this feeling may intensify into puberty

- take time to understand the thoughts and feelings of children who are questioning their gender and will be appropriately professionally curious about the full range of the child's experiences
- recognise that social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying
- adopt policies across school life that maintains flexibility and avoids rigid rules based on gender stereotypes
- take a strong, proactive stand against all forms of bullying
- ensure that the decision-making process is documented and records are kept
- make sure all relevant staff are aware of a pupil's biological sex and record a child's biological sex accurately. wherever it is recorded
- comply with our obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by our evaluation of the welfare and best interests of the child and other children
- understand that our students, given their age, will generally have greater agency to make their own decisions however it is still important to maintain flexibility and keeping children's options open will help to avoid a child feeling they are under pressure to commit to a potentially irrevocable pathway when they are young
- recognise the importance of clinical involvement in the decision-making process which includes advising on the risks and benefits of social transition as a planned intervention, referencing best available evidence
- involve parents and carers in most cases; any exceptions will be justified by a specific documented safeguarding risk and formally recorded

We will make decisions in line with:

- our statutory duties to safeguard and promote the welfare of all children considering what is the best interests of the child and other children (noting that a decision relating to social transition may not be the same as a pupil's wishes. This will involve:
    - working together with parents or carers (in the vast majority of cases) to determine what is in the best interests of the child
    - considering any clinical evidence/advice and seeking any additional non-clinical professional advice where relevant (for example from the SENDCo), including involving the designated safeguarding lead

- considering any relevant factor that could be affecting the pupil, including whether they have any wider health issues or neurodiversity.
- taking a careful approach
- exploring how best to support conversations with parents and carers, including offering a staff member to be present or to speak to parents or carers on the child's behalf. Where a child confides in us about their feelings but does not ask us to make changes to how they are treated, we will not break the pupil's confidence unless there is a related safeguarding risk
- following our usual procedures where a conversation with a pupil raises concerns about their wellbeing or safety, including involving parents or carers where appropriate
- keeping in mind that some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex, and schools should be aware of related safeguarding concerns

The Equality Act and Human Rights Act - Please see related sections 11 and 12 (our school policy on sport, toilets, changing facilities and overnight accommodation.) In relation to other school policies, we will consider whether the policy will place a child who is questioning their gender at a disadvantage relative to other children when developing the policy itself and when considering requests to be exempt from such policies. Where the rule or policy does place a gender-questioning child at a disadvantage compared with those who are not gender-questioning, we will consider whether the policy has a legitimate aim and if the policy is a proportionate means of achieving that legitimate aim. We will balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. This will include taking into account our judgment about whether supporting social transition is in the child's best interests and the best interests of other children.

We will take time to sensitively explain the constraints on social transition including explaining that supporting any degree of social transition will not include allowing access to toilets, changing rooms or overnight accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex, where there are safety reasons for single sex PE.

We will make sure that children and their families are aware that while the school will appropriately sanction cases of bullying or harassment, and take a strong stand against bullying, we must also be conscious of the rights of pupils and staff in relation to their religion or belief.

We may consider discussing options with pupils and staff such as using names instead of pronouns.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by a school and a child's parents or carers have been involved (unless a clear safeguarding risk has been formally documented).

Review

We recognise that the circumstances and/or the needs of the pupil may change over time and we may need to review our original decision, including involving the child's parents or carers. In deciding whether to review a decision, we will involve our DSL immediately.

We will revisit decisions at appropriate intervals, and will consider whether previous decisions taken prior to KCSIE 2026 remain appropriate, taking into account the impact of making any changes on the pupil in question and considering the principle above about involving parents or carers.

Children living in stealth

We will be particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth as we recognise that these pupils are likely to approach puberty in a fearful and anxious state. We will involve the designated safeguarding lead in these cases.

Support for children who wish to detransition

There may be circumstances where a pupil wants to fully or partially reverse a request that has previously been agreed. We will maintain flexibility and keep options open for pupils who have socially transitioned and provide support to pupils who wish to de-transition. We will work closely with parents or carers and relevant experts to ensure that children in this position are supported.

18. Restrictive interventions

A restrictive intervention is a means to prevent, restrict or subdue movement of the body or part of a body of a pupil. It covers both physical and non-physical actions aimed to restrain pupils.

All members of staff are permitted to use a restrictive intervention, including reasonable force, in the following circumstances, to prevent a pupil from:

- Causing disorder
- Hurting themselves or others
- Damaging property
- Committing an offence

The DfE guidance (Restrictive interventions, including use of reasonable force, in schools 2026) states that schools should not have a 'no contact' policy and schools should not grant any requests by parents or staff members not to use reasonable force and/or other restrictive interventions. This is to ensure that staff can intervene where reasonable in the circumstances to fully protect pupils.

For more information and how we aim to minimise restrictive interventions, please refer to the relevant section in our behaviour (pupil) policy.

19. Safeguarding separations

A safeguarding separation is a temporary administrative measure available to us to require a pupil to learn off-site for a set period of time to protect the safety and welfare of other students or staff. Please refer to our behaviour (pupil) policy for more information.

20. Volunteers

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, are expected to follow the policies and procedures in the same way as paid staff.

All volunteers in our school who perform a role that either:

a) involves teaching, training, instructing or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children frequently or on more than 3 days in a 30-day period; or

b) engages in intimate or personal care or healthcare or any overnight activity, even if this happens only once

will have an enhanced DBS check with children's list barred information. Where an individual volunteers more than 3 days in a 30-day period by volunteering at multiple settings, we will work with the other settings to decide who should apply for the enhanced DBS check with barred list information. We will ensure that if we do not carry out the check we will hold the necessary check information.

An enhanced DBS check with children's list barred information will also be carried out when:

- The volunteer moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children
- there has been a break in service of 12 weeks or more, or
- there are concerns about an individual's suitability to work with children

Where a parent or other volunteer helps on a one-off basis, he/she will only work under the direct supervision of a member of staff, and at no time have one to one contact with children.

21. Before and After School Activities and Contracted Services

Where the Trust Board/Local Governing Committee transfers control or otherwise allows the use of school premises to external bodies (such as sports clubs) or service providers during or out of school hours, we will ensure that these bodies or providers to have appropriate safeguarding policies and procedures, (inspecting these if necessary. We also strongly recommend that there are arrangements in place to co-ordinate with the school on such matters. We will ensure safeguarding requirements are included in any transfer of control agreement (i.e. or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

22. Alternative provision

We will seek written confirmation from our alternative provision providers that

- appropriate safeguarding checks have been carried out of their staff

- they will notify us of any changes that might put children at risk, such as staff changes, so we can ensure that appropriate safeguarding checks have been carried out

We will:

- maintain records of the address of the alternative provider and any subcontracted provision
- review alternative provision placements at least half termly to ensure the child is regularly attending, the placement continues to be safe and it meets the child's needs
- be aware of the additional risk of harm these pupils may be vulnerable to

Where safeguarding concerns arise the placement will be immediately revised and/or terminated unless the concerns have been satisfactorily addressed.

23. Complaints and concerns about school safeguarding policies

23.1 Complaints against staff

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

23.2 Other complaints

For other safeguarding complaints for example, those related to pupils or premises, please refer to our complaints policy on our website The Piggott School - Statutory Information and Policies

23.3 Whistleblowing

We have a separate whistleblowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures. This is published on our school website The Piggott School - Statutory Information and Policies

24. Conduct of Staff

The school has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. All staff in the school will read and sign to confirm that they have read and will abide by the Staff Code of Conduct annually.

At all times, members of staff are required to work in a professional way with children. All staff should be aware of the expectations, inherent risks and possible consequences in:

- Working alone with a child
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information;
- Giving to, and receiving gifts from, children and parents
- Contacting children through private telephones (including texting), e-mail, MSN, or social networking websites
- Disclosing personal details inappropriately

- Meeting pupils outside school hours or school duties
- Making inappropriate sexual comments; excessive one to one attention beyond the normal requirements of the role; or inappropriate sharing of images

If any member of staff has reasonable suspicion that a child is suffering harm or at risk, and fails to act in accordance with this policy, this will be viewed as misconduct or gross misconduct, and appropriate action will be taken.

25. Supporting staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or who appears likely to suffer harm, may find this situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through anxieties with the Senior Designated Person or Headteacher and to seek further support, if necessary. Supervision will be offered to our DSL's, Deputy DSL's and any other staff identified as possibly benefitting from this. The Senior and Deputy Designated Persons and the Headteacher can seek personal support through ARC counselling services and Supervision from Building Resilience in Young Minds. See page 4 for contact details, or other appropriate counselling services.

Staff will have access to The Guidance for Safer Working Practices for Adults who work with Children and Young People. This provides advice on the boundaries of appropriate behaviour and the circumstances that should be avoided in order to limit complaints against staff of the abuse of trust and/or allegations of abuse.

26. Record-keeping

We will hold safeguarding records in line with our records retention schedule. This includes recruitment and recruitment and pre-appointment checks and allegations of abuse made against staff.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing on CPOMS within 24 hours of disclosure. All records must provide a factual, evidence-based account. Accurate recording of actions must be made. Records will be signed, dated and where appropriate witnessed. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. 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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely electronically and only available to those who have a right or professional need to see them. Two-factor authorisation is required to access safeguarding files. Authorisation to access these electronic records will be controlled by the DSL. Records will be kept up to date and reviewed regularly. Original notes will be retained as evidence if there are criminal proceedings arising from current or historical allegations of abuse or neglect.

Safeguarding records relating to individual children will be retained in accordance with our retention of records schedule.

On transfer of a child, safeguarding information is sent electronically where the receiving school has the CPOMS system. If they are using a paper-based system, a paper copy of the file is printed and hand-delivered, and a receipt requested. All files are delivered to the receiving school's Headteacher or DSL. This will be done separately from the main pupil file.

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

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

In addition, if the concerns are significant, complex, where information indicates a risk to others and/or the individual pupil, the pupil is or has been a victim of abuse, the pupil is currently receiving support through the 'Channel' programme, 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.

Where the new school is not known the Educational Welfare Officer at WBC should be informed so that the child can be included on the data base for Children Missing Education.

27. Training

27.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment

- Have a clear understanding of the needs of all pupils

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

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

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

Volunteers will receive appropriate training, if applicable.

27.2 The DSL and deputies

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

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

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

27.3 Trustees & Governors

The Designated Safeguarding Governor Emma Kennett will undertake initial Safeguarding training and refresher training every year. All trustees and governors will undertake an enhanced DBS check and Prevent training. All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated, at least annually. This is to make sure that they:

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

As the Chair of the Trust Board and Chair of the Local Governing Committee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher or CEO, they receive training in managing allegations for this purpose.

27.4 Recruitment – interview panels

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

28. Monitoring arrangements

This policy will be reviewed **annually** by the DSL and the Lead Governance Professional. At every review, it will be approved by the Curriculum Committee of the Trust Board and the Local Governing Committee.

29. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Prevent
- Health and safety
- Attendance
- Equality
- Relationships and sex education and PSHE
- First aid
- Privacy notices
- Whistleblowing
- IT and acceptable usage
- Anti bullying
- Safer recruitment policy
- Data protection
- SEND
- Retention of records schedule
- BYOD
- Lockdown procedures
- Medical needs
- SMSC
- AI

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap. It is recognised that children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Controlling and coercive behaviour, teenage relationship abuse, 'honour', faith- or belief-based abuse

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

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

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

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

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

Appendix 2: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

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

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

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

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

Children who are absent from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel

- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

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

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

We will work with the Local Authority's Childrens Services where a child's absence indicates a safeguarding concern.

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse and the victim may identify as being part of the group.

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

CCE can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. Modern Slavery guidance

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

The school and Trust remains committed to working alongside the Police and other agencies in order to support early recognition and intervention for young people who are at risk of this type of exploitation.

Further information and support can be found by using the 'County Lines Toolkit for professionals' County Lines Toolkit For Professionals | The Children's Society (childrenssociety.org.uk)

Child sexual exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Most sexual abuse is committed by those previously known to the victim.

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

Victims are not always recognised and can be criminalised for actions they take whilst under coercion.

CSE can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. Modern Slavery guidance

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

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

- Having an older boyfriend or girlfriend

- Suffering from sexually transmitted infections or becoming pregnant

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

Child-on-child abuse (including harassment or violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- The threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, which may include misogyny/misandry, ~~such as~~ sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making and sharing of nude and semi-nude visual content (including digitally altered or produced via AI)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

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

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

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

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

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

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

If a member of staff is concerned that a pupil is subject of or witness to domestic abuse then this should be reported to the DSL.

Please also refer to appendix 3 regarding operation encompass.

Homelessness

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

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

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

Local housing authorities notify us when a child is placed in temporary accommodation following consent from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents. This notification will enable us to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes. This notification does not replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

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

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

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

The DSL will:

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

Preventing radicalisation

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

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

Our School values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, with freedom of speech comes responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the Prevent Lead, Mr David Thatcher, DSL or Headteacher who will follow safeguarding procedures in our prevent policy.

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

If the matter is urgent then Thames Valley Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then contact should be via 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Further information on the school's measures to prevent radicalisation are set out in our prevent policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum, may overlap and may escalate into more serious sexual harassment or sexual violence

We will recognise, acknowledge, and understand the scale of harmful sexual behaviour (HSB), sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

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

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

When supporting victims, staff will:

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

Following a report of sexual violence:

- the DSL will carry out a risk and needs assessment which is recorded, regularly reviewed and used to inform ongoing safeguarding decisions. The designated safeguarding lead (or a deputy) will engage with children's social care and specialist services as needed. Professional risk assessments by social workers or sexual violence specialists are likely to be required. These will

be used to inform our approach to supporting and protecting pupils and updating our risk assessment.

- For reports of rape and penetration, the alleged perpetrator(s) will be removed from any shared classes with the victim and we will carefully consider how to maintain a reasonable physical separation between the victim and alleged perpetrator(s) across school premises including before or after school-based activities, and on transport to and from the school, where appropriate. These actions will be in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).
- For other reports of sexual harassment and sexual violence, decisions about shared classes, proximity on site, sharing school premises and school transport, will be considered immediately. All initial responses will be carefully evaluated and reflect the considerations including the victim's wishes, the nature of the allegations and the need to protect all children involved.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the escalatory nature of misogyny and the benefits of early identification to support our approach to minimising the risk of HSB, sexual harassment and sexual violence
- Understanding some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

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

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- Being male
- Those that have had disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision)
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Having used drugs or alcohol in early adolescence, and
- Having previously been a victim or previously perpetrated violence

Violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence.

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

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the Designated Safeguarding Lead (or a deputy). The Designated Safeguarding Lead will assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they will consider putting in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence).

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 appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will: Email all staff asking for any information on the child's location, search the school site, inform parents and contact the Police as appropriate.

Appendix 3: Operation Encompass Safeguarding Statement

The schools in our Trust are part of Operation Encompass. Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

Operation Encompass means that the police will share information with our schools about all police attended Domestic Abuse incidents which involve any of our children PRIOR to the start of the next school day. The notification informs us about the context of the incident and includes the Voice of the Child.

Once a Key Adult (DSL) and their deputy/ies (DDSLs) have attended either an Operation Encompass briefing or have completed the free National Online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other staff to enable them to understand how to support a young person following a referral. All staff are encouraged undertake the online training.

Our DSL undertook training on 5th June 2025.

Our DDSLs undertook training on 3rd June 2025 (Mrs Kenneally), 7th July 2025 (Mrs Colby) and 18th July 2025 (Ms Thornton).

Our Safeguarding Governor undertook training on 14th April 2025.

Our parents are aware through the school website that we are an Operation Encompass school.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information on CPOMS.

The Key Adult/s have led training for all staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children.

Our schools have also discussed how we can support our children who are experiencing Domestic Abuse on a day-to-day basis and particularly following the Operation Encompass notification.

We have used the free Operation Encompass Handbooks to inform our thinking.

We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

Operation Encompass does not replace statutory safeguarding procedures or referrals.

The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

We have used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken by us.

When the Headteacher, DSL or DDSLs leave the school and other staff are appointed, they will ensure that all Operation Encompass log in details are shared with the new Headteacher /Key Adults and that the new member of staff will undertake the Operation Encompass online training.

Appendix 4: Allegations against staff including low level concern procedures

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

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

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

If there is any doubt as to whether a concern meets the harm threshold, the Headteacher (or their designated representative) will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. The case manager will be appointed by the Headteacher (or the CEO if the allegation relates to either a headteacher or a member of the Central Trust Team or the Chair of the Trust Board if the allegation relates to the CEO). The case manager will be identified at the earliest opportunity. In the absence of the Headteacher the DSL or a Deputy Head will assume the role of case manager.

Headteachers will inform the CEO of any investigations at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the trust premises to run activities for children or the allegation relates to a former member of staff, we will follow this policy and our safeguarding policies and inform our LADO.

Suspension of the accused until the case is resolved

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

The decision to suspend will be taken by a Headteacher in consultation with the CEO (or CEO if the allegation relates either to a headteacher or member of the Central Trust Team or the Chair of the Trust Board if the allegation relates to the CEO).

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children

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

If in doubt, the Headteacher, CEO or Chair of the Trust Board will seek views from the trust's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority at their earliest convenience, preferably within 24 hours. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Ask the Headteacher, CEO or Chair of the Trust Board, as appropriate, to consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and Headteacher and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, in conjunction with the Headteacher, CEO or Chair of the Trust Board, 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 trust 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. This decision should be taken with the Headteacher (or CEO/Chair of the Trust Board).
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- We have a duty of care to our members of staff. We will act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the LA or the police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for support. They may also be given access to welfare counselling or medical advice.
- The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care will be taken when employees are suspended, to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes

to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child. For the avoidance of doubt this includes volunteers who work in regulated activity.

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

Additional considerations for trainee teachers, 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 trainee teacher, 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 Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the trust or school, while the trust or school carries out the investigation
- We will involve the agency fully, but the trust or school will take the lead in collecting the necessary information and managing the safeguarding process, and involving the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within one working 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 and our staff disciplinary policy will be followed

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the trust 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 Trust will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

The case manager and Headteacher (CEO or Chair of the Trust Board, where appropriate) 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 trust will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations 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 and/or Headteacher (or CEO or Chair of the Trust Board, where appropriate) will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

For all other cases, the case manager and/or Headteacher (or CEO or Chair of the Trust Board, where appropriate) will consider the facts and determine whether any improvements can be made.

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

This section applies to all concerns (including allegations) about members of staff, including trainee teachers, supply teachers, volunteers and contractors, which do not meet the harm threshold as set out in section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

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

If the low-level concern relates to a Headteacher or a member of the Central Trust Team the CEO will collect the evidence and determine any further action. If the low-level concern relates to the CEO the Chair of the Trust Board or their appointed representative will collect the evidence and determine any further action.

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 data protection laws
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

References

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

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

Appendix 5: Intimate care form

Permission for school to provide intimate care

If you child has an accident while in school, we require your permission to change them. Please fill out the form below, any questions please ask your class teacher.

Name of child		
Date of birth		
Name of parent/carer		
I give permission for the school to provide appropriate intimate care to my child (e.g. changing soiled clothing, washing and toileting)		□
I will advise the school of anything that may affect my child's personal care (e.g. if medication changes or if my child has an infection)		□
I understand the procedures that will be carried out and will contact the school immediately if I have any concerns		□
I **do not** give consent for my child to be given intimate care (e.g. to be washed and changed if they have a toileting accident). Instead, the school will contact me or my emergency contact and I will organise for my child to be given intimate care (e.g. be washed and changed). I understand that if the school cannot reach me or my emergency contact if my child needs urgent intimate care, staff will need to provide this for my child, following the school's intimate care policy, to make them comfortable and remove barriers to learning.		□
Parent/carer signature		
Name of parent/carer		
Relationship to child		
Date		