

SAFEGUARDING (Child Protection Policy)

CONTENTS

INTRODUCTORY STATEMENT.....	3
STATUTORY FRAMEWORK AND COMPLIANCE.....	3
ACCESSIBILITY AND AVAILABILITY.....	4
AIMS.....	4
KEY CONTACTS.....	5
KEY EXTERNAL CONTACT DETAILS	5
This policy has regard to the following guidance and advice:	8
EQUALITY ACT 2010.....	9
CONCERNS ABOUT A CHILD	9
DEFINITIONS OF CHILD PROTECTION AND SAFEGUARDING AND TYPES AND SIGNS OF ABUSE.....	9
PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD.....	10
CONTEXTUAL SAFEGUARDING.....	13
FAMILY/EARLY HELP	13
WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT A CHILD	14
WHAT STAFF SHOULD DO IF A CHILD IS IN DANGER OR AT RISK OF HARM.....	14
WHAT STAFF SHOULD DO IF A CHILD IS SEEN AS AT RISK OF RADICALISATION.....	15
WHAT STAFF SHOULD DO IF THEY DISCOVER AN ACT OF FEMALE GENITAL MUTILATION ("FGM") ...	15
WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS THAT CHILDREN ARE AT RISK FROM OR INVOLVED WITH SERIOUS VIOLENT CRIME	15
HOW SHOULD STAFF RESPOND TO AN INCIDENT OF NUDES AND SEMI-NUDES BEING SHARED BY PUPILS	16
WHAT STAFF SHOULD DO IF A CHILD IS ABSENT FROM EDUCATION.....	18
WHAT STAFF SHOULD DO IF A CHILD NEEDS A SOCIAL WORKER (CHILDREN IN NEED AND CHILD PROTECTION PLANS).....	18
YOUNG CARERS.....	18
CHILDREN WITH MEDICAL CONDITIONS.....	19
WHAT STAFF SHOULD DO IF A CHILD REQUIRES MENTAL HEALTH SUPPORT.....	19
ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT).....	20
DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS), VOLUNTEERS AND CONTRACTORS	24
What staff should do if they have safeguarding concerns about another staff member	24

What staff should do if they have concerns about safeguarding practices in the School.....	24
PROCEDURE FOR MANAGING ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS.....	29
DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES.....	29
DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)	30
SAFER RECRUITMENT	31
MANAGEMENT OF SAFEGUARDING	32
TRAINING	34
OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES.....	36
THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES	37
TEACHING CHILDREN HOW TO KEEP SAFE	37
FILTERING AND MONITORING	38
RELATIONSHIPS EDUCATION AND/OR RELATIONSHIPS AND SEX EDUCATION ("RSE").....	39
LOOKED AFTER CHILDREN.....	39
ARRANGEMENTS FOR PUPILS ATTENDING ALTERNATIVE PROVISION.....	39
ARRANGEMENTS FOR VISITING SPEAKERS	40
ARRANGEMENTS FOR USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES.....	40
EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS.....	41
DISQUALIFICATION FROM WORKING IN CHILDCARE	41
USE OF MOBILE DEVICES AND CAMERAS	41
DSL FOR THE EYFS	41
DUTY TO NOTIFY OFSTED.....	42
APPENDIX 1 –SIGNS AND TYPES OF ABUSE	42
APPENDIX 2	57
APPENDIX 3	59
Allegations that do not Meet the Harms Threshold (LOW-LEVEL CONCERNS)	59
Procedure.....	60

MONITORING AND REVIEW

Staff Responsible	DSL
-------------------	-----

The School refers to all staff and students in St Mary's School, which includes the Early Years/Foundations Stage (EYFS), the Preparatory Department (Years 1-6), Senior House (Years 7-11) and the Sixth Form (Years 12-13).

The term 'parent' refers to those who have parental responsibility for a child.

Reviewed by	Safeguarding Governor, DSL & SLT
Approved by	Governing Body
Frequency of Review	Annually
Date of Last Review	August 2026
Date of Next Review	August 2027

INTRODUCTORY STATEMENT

Safeguarding is considered in all strategic decision-making, recruitment activity, curriculum planning, educational visits, online systems and pastoral provision.

At St Mary's School, safeguarding and promoting the welfare of children is at the heart of everything we do. We are fully committed to creating a culture in which all pupils feel safe, secure, valued and listened to.

We are a listening school. We recognise that:

- children may not always feel ready or able to share concerns
- they may not recognise their experiences as harmful
- they may communicate distress through behaviour rather than words

All staff are therefore expected to demonstrate professional curiosity, to notice, to question, and to act in the best interests of the child at all times. All staff are expected to respectfully explore inconsistencies, challenge assumptions and seek clarification where a child's presentation, attendance, conduct or circumstances cause concern.

The School recognises that safeguarding practice is strengthened by actively seeking, hearing and acting upon the views, wishes and feelings of children. We actively encourage all pupils to speak to a trusted adult about anything that worries them. Pupils are supported by a wide network of adults across the School, including teaching and pastoral staff, the safeguarding team and other trained professionals.

All adults working in the School share a collective responsibility for safeguarding. We maintain a culture of openness, vigilance and accountability, underpinned by the principle that "it could happen here."

The School actively promotes a safeguarding culture in which:

- safeguarding is everyone's responsibility;
- concerns are raised without delay;
- children are encouraged and supported to report worries;
- all reports are taken seriously;
- professional curiosity is expected;

- staff feel able to challenge poor practice;
- safeguarding concerns are responded to promptly and proportionately.

The School is committed to promoting an inclusive, respectful and anti-discriminatory culture in which diversity is valued and all members of the community are treated with dignity and respect. The School recognises that fostering such a culture is an important part of safeguarding and promoting the welfare of children. Incidents of racism, faith-targeted abuse and other discriminatory behaviour are taken seriously and responded to promptly, proportionately and in accordance with safeguarding procedures where appropriate.

STATUTORY FRAMEWORK AND COMPLIANCE

This policy is designed to meet the School's obligations under:

- The Education (Independent School Standards) Regulations 2014/2019 (ISSRs)
- The Statutory Framework for the Early Years Foundation Stage (EYFS)

In accordance with these, the School has arrangements in place to safeguard and promote the welfare of pupils and must have regard to statutory guidance issued by the Secretary of State, in particular:

- Keeping Children Safe in Education (KCSIE 2026)
- Working Together to Safeguard Children (2026)
- Prevent Duty Guidance (2023)

All staff, including those who do not work directly with children, must:

- Read and understand Part One of KCSIE and any additional sections or annexes relevant to their role and responsibilities.
- adhere to the Staff Code of Conduct
- follow this policy at all times

The School will maintain records demonstrating that all staff have received, read and understood the statutory safeguarding guidance.

The School also works in partnership with Buckinghamshire Safeguarding Children Partnership (BSCP). It takes into account local procedures from the BSCP and works in partnership with statutory safeguarding agencies.

ACCESSIBILITY AND AVAILABILITY

This policy:

- is reviewed annually (or sooner if required)
- is available on the School website

- is accessible to parents, staff and pupils
- can be provided in hard copy on request

The School ensures that safeguarding information is clearly communicated and easily understood by all members of the community.

AIMS

The **aims** of this policy are:

- To ensure that the best interests of the child are at the forefront of all systems and processes.
- To support the child's development in ways that will foster security, confidence and resilience
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- To provide an environment where children feel comfortable to approach staff with concerns, confident they will be listened to, and inappropriate behaviour will be addressed. To maintain an attitude of 'it could happen here'.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and promptly reporting possible cases of abuse, acknowledging at all times the crucial importance of Early Help.
- To raise the awareness of staff that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments
- To make staff aware that 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.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure that we, the School, contribute to assessments of need and support plans for those children.
- To ensure that the school has robust systems in place for ensuring the true and accurate records of events are kept and appropriately stored, and to ensure that any such records clearly differentiate between fact and opinion.
- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To develop effective working relationships with all other agencies involved in safeguarding children, sharing information quickly and challenging inaction.
- To ensure that all adults within our school who have access to children have been checked as to their suitability. This includes volunteers and other community users of our facilities as well as visiting speakers, the latter to be carefully researched and vetted by the Head.
- To ensure resources are allocated to meet the needs of pupils requiring child protection or early intervention.

KEY CONTACTS

Governors' Committee Responsible:	The Full Governing Body
Governor Lead:	Mrs Christine Bayliss

Chair of Governors:	Mr Derek Wilson – for contact see low level concerns section and whistleblowing policy.
Designated Safeguarding Leads:	Mrs Mairead Carney, Deputy Head (Head of Prep & DSL) mcarney@stmarysgx.co.uk 01753881838 Miss Rebecca Rose, Head of Pre-Prep (EYFS and DDSL for the Prep Department) rrose@stmarysgx.co.uk
Deputy Designated Safeguarding Lead:	Mrs Kathryn Chamberlain Y1 Teacher (EYFS and Prep) kchamberlain@stmarysgx.co.uk Mrs Gillian Sugrue Director of learning Support & Transition (Prep & Y7 & 8) gsugrue@stmarysgx.co.uk Mrs Grace Stacey, Head of KS3 (KS3) gstacey@stmarysgx.co.uk Miss Sam Kelly (KS4) skelly@stmarysgx.co.uk Miss Fiona Crossland, HOY (Senior House) FCrossland@stmarysgx.co.uk Mrs Katie Cork, Deputy Head (Senior House) kcork@stmarysgx.co.uk Mrs Alexandra Francisco, (KS5) afrancisco@stmarysgx.co.uk
Status & Review Cycle:	Annually (or as needed following updates to related guidance)
Date of Last Review:	August 2026
Next Review Date:	August 2027

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer (Buckinghamshire Council)	Team - secure-lado@buckinghamshire.gov.uk Telephone: 01296 382070 Local Family Support Team Area C5 Team Manager Gifty Dzah 01296 383 962 between 9am to 5:30pm Monday to Thursday, 9am to 5pm Friday. 0800 999 7677 before 9am, after 5:30pm (5pm on a Friday) or at weekends (Emergency Duty Team). EMAIL:
First Response	Tel: 01296 383962

Education Safeguarding Advisory Service (ESAS) Team	T: 01296 387981 – central ESAS number E: secure-esasduty@buckinghamshire.gov.uk Tracey Ireland tracey.ireland@buckinghamshire.gov.uk 01296382817 01296382822
Multi-Agency Safeguarding Hub – Bucks safeguarding partnership	TEL: 01296 387146 Non-emergency
Support and Advice about Extremism	Police Preventreferrals@thamesvalley.pnn.police.uk Out of hours call 101 and ask for the on call Special Branch Sergeant EMERGENCY: 999 National Police Prevent Advice Line: 0800 0113764 Or Claire Annison P6553 TEL: 07976 722061 claire.annison@thamesvalley.police.uk To report information call the Anti-Terrorist Hotline 0800 789321 Local Authority Concerns about a child – email - secure-cypfirstresponse@buckscc.gov.uk or call 01296 383962 Outside normal office hours – Ring the Emergency Duty Team on 0800 999 7677 Department for Education NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 (Monday to Friday 8am to 8pm; weekends between 9am and 6pm) EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk

Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbb.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net
Operation Encompass Contact	Encompass@thamesvalley.police.uk
Integrated Care Board (BOB ICB)	https://www.bucksoxonberks.wicb.nhs.uk/about-us/what-is-the-integrated-care-system/

This policy is reviewed and updated annually (as a minimum) and is available on the School website.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) ("KCSIE")
 - KCSIE incorporates the additional statutory guidance *Disqualification under the Childcare Act 2006* (September 2018)
 - KCSIE also provides links to various toolkits and additional advice and support
- *Working Together to Safeguard Children* (Updated March 2026) ("WT")
 - WT refers to the non-statutory advice: *Information sharing* (July 2018)
- *Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023*. Prevent is supplemented by non-statutory advice and a briefing note:
 - *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
 - *The use of social media for on-line radicalisation* (July 2015)

- *Relationships education, relationships, and sex education (RSE) and health education* (September 2026).
- *Children's Social Care National Framework* (December 2023)
- *Behaviour in Schools* (2024)
- *Restrictive interventions, including Use of Reasonable Force, in schools- Guidance for schools in England* April 2026
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities* (February 2024)
- *Digital and technology standards in schools and colleges* (March 2023)
- *Generative AI: Product Safety Expectations* (January 2025)
- *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (February 2026)
- *Arranging Alternative Provision Guidance* (February 2025)
- The Charity Commission Guidance: *Safeguarding and protecting people for charities and trustees* (June 2022)

This policy also takes into account the procedures and practices of Buckinghamshire Council as part of the multi-agency safeguarding arrangements set up by the Buckinghamshire Safeguarding Children Partnership (BSCP), the Integrated Care Board (BOB ICB), and the Thames Valley Police, our three safeguarding partners.

EQUALITY ACT 2010

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the school, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help, which are shared on FireFly here: <https://stmarysgx.fireflycloud.net/student-briefing/where-to-get-support>

DEFINITIONS OF CHILD PROTECTION AND SAFEGUARDING AND TYPES AND SIGNS OF ABUSE

Safeguarding and promoting the welfare of children is defined as:

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

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

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

Staff should recognise that prejudice-based harm, including racism, faith-targeted abuse, antisemitism, Islamophobia, disability discrimination, sexism, homophobia, biphobia, transphobia and other forms of discriminatory behaviour, can be harmful in and of themselves. Such incidents may cause significant emotional, psychological or social harm and should be treated seriously as safeguarding concerns where they impact a child's welfare, wellbeing or safety.

Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions see **Appendix 2** for the TED Acronym for asking questions
- observe their behaviour

- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing on CPOMS. This includes instances where referrals were or were not made to another agency, such as Children's Social Care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and electronically signed by the person making it. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*. You can ensure this when deciding who is given visibility to each concern made on CPOMS, if in doubt, do not add any additional staff to the visibility, leaving this for the DSL to decide. Each update should be entered as a new incident on CPOMS to ensure the timeline is established.

Child protection records will be maintained in accordance with *KCSIE* and local safeguarding procedures. Records will be factual, contemporaneous, secure, confidential and capable of supporting effective multi-agency working.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. If we consider the child is at risk of harm, we will always refer to BSCP. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The School implements a child-centred approach to safeguarding. Whilst the School are committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. As part of the wider assessment of children, the School will consider whether environmental factors present in a child's life threaten their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

EARLY HELP /FAMILY HELP

'Family Help' is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. The School recognises the role of Family Help arrangements and will work with safeguarding partners to secure appropriate support for children and families where concerns emerge. Where appropriate the School will participate in Team Around the Family arrangements.

Family help may be appropriate for children who have several needs, or whose circumstances might make them more susceptible. All staff should be particularly alert to the potential need for Family Help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health, and Care Plan)
- Has a mental health need
- Is a young carer - The School recognises that young carers may experience additional vulnerabilities including emotional wellbeing concerns, attendance difficulties, social isolation, caring responsibilities beyond their age and increased safeguarding risks. Staff will ensure that young carers are identified early and receive appropriate support through Early Help processes where necessary.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs and other alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited

- Has a parent or carer in custody, or is affected by parental offending
- Is a privately fostered child
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils, using a vulnerability matrix. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments. In the Bucks Safeguarding Children Partnership (BSCP) this requires knowledge of Level 3 on the Thresholds document. The DSL and DDSs will maintain familiarity with the current Buckinghamshire Threshold Guidance and referral criteria.

In the first instance, staff who identify a pupil who may benefit from Family Help should discuss this with the School's DSL. If appropriate, the DSL will work with the BSCP, Police, and BOB ICB, to undertake an assessment of the need for Family Help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children 2026 ("WT").

If Family Help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT A CHILD

If staff (including governors, supply staff, agency staff and volunteers) have any safeguarding concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

As set out above, staff should not assume that somebody else will take action and share information that might be critical to keep a child safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS.

WHAT STAFF SHOULD DO IF A CHILD IS IN DANGER OR AT RISK OF HARM

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Where a child is in immediate danger or at risk of harm, the referral must be made immediately to children's social care and/or the police. Staff must not delay a referral while attempting to contact the DSL. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's works in partnership with the Bucks Safeguarding Children Partnership (BSCP). A full copy of their local procedures can be found on their website

<https://www.buckssafeguarding.org.uk/childrenpartnership/> .

Staff are aware of school procedures, for example, when teaching on a 1:1 out of hours they will inform their SLT link or line manager, and ideally teach with the door open and in a location that is not considered to be remote or secluded. See supervision policy for more information.

WHAT STAFF SHOULD DO IF A CHILD IS SEEN AS AT RISK OF RADICALISATION

Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to radicalisation into terrorism. This may include a Prevent referral or referral to children's social care depending on the level of risk.

<https://www.buckssafeguarding.org.uk/childrenpartnership/reporting-a-concern/>

However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or call the MASH team directly. Telephone: – 01296 383962 between 9am-5pm Monday to Friday. If you need an urgent response outside of these hours, contact the Emergency Duty Team (EDT) on 0800 999 7677.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online . Such risk assessments are discussed with the Head, DSL, SLT, and the governor responsible for safeguarding, to ensure the School's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified and appropriate support is provided and is regularly revised as needed.

WHAT STAFF SHOULD DO IF THEY DISCOVER AN ACT OF FEMALE GENITAL MUTILATION ("FGM")

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to **Appendix 1** of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS THAT CHILDREN ARE AT RISK FROM OR INVOLVED WITH SERIOUS VIOLENT CRIME

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

HOW SHOULD STAFF RESPOND TO AN INCIDENT OF NUDES AND SEMI-NUDES BEING SHARED BY PUPILS

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and members of the safeguarding team.
- Carrying out interviews with the child(ren) involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- 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.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head, and possibly in consultation with the First Response team. The decision will be made and recorded (on CPOMS and the serious incident log) in line with this Policy, and will be based on

consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

WHAT STAFF SHOULD DO IF A CHILD IS ABSENT FROM EDUCATION

The School recognises that both persistent absence and children missing education may indicate abuse, neglect, child sexual exploitation, child criminal exploitation, serious violence, mental health difficulties, radicalisation or other safeguarding concerns.

Attendance information will be reviewed regularly by safeguarding leaders and concerns escalated promptly where safeguarding risks are identified.

The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are explained in detail in the Attendance, Missing Child or Child Missing from Education Policy which is to be used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found in **Appendix 1** of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026).'*

WHAT STAFF SHOULD DO IF A CHILD NEEDS A SOCIAL WORKER (CHILDREN IN NEED AND CHILD PROTECTION PLANS)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

YOUNG CARERS

The School recognises that young carers may undertake practical, emotional or physical caring responsibilities within their family which can affect attendance, wellbeing, progress and safeguarding outcomes.

Staff should remain professionally curious where a pupil appears excessively responsible for caring duties. Where identified, the DSL will consider whether Early Help or additional pastoral intervention is required.

The School will work with families, local agencies and external professionals to ensure that young carers receive appropriate support.

CHILDREN WITH MEDICAL CONDITIONS

Children with medical conditions may face additional safeguarding vulnerabilities. Staff should not assume that indicators of abuse, neglect, exploitation or emotional distress are solely attributable to a child's health condition.

Safeguarding arrangements will operate alongside the School's Supporting Pupils with Medical Conditions procedures and appropriate information sharing arrangements.

WHAT STAFF SHOULD DO IF A CHILD REQUIRES MENTAL HEALTH SUPPORT

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes speaking to the DSL, and working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people. <https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

Mental health concerns must not be viewed in isolation. Staff should always consider whether presenting mental health needs may indicate underlying abuse, neglect, exploitation, online harm, domestic abuse or wider safeguarding concerns and respond appropriately.

CHILD-ON-CHILD ABUSE INCLUDING SEXUAL HARASSMENT AND SEXUAL VIOLENCE

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), **discriminatory behaviour including racism, faith-targeted abuse and other prejudice-based incidents**, abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Child-on-child abuse may also include misogyny, misandry, coercive behaviour, image-based abuse, prejudice-based abuse, technology-assisted abuse, harmful online interactions and behaviours linked to extremist ideologies.

The School recognises that safeguarding concerns frequently overlap and may present through multiple forms of abuse simultaneously.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". Staff will also challenge physical behaviours (that are 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.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children, available in posters and on FireFly.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff

about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges, and, may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children such as LEAPS, ELSA, or Mentoring from the Head of Year. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes the following steps to minimise the risk of child on child abuse:

- Everyone understands what child-on-child abuse is.
- Staff receive regular training.
- Inappropriate behaviour is challenged.
- Preventative curriculum is delivered.
- Leaders understand local risks.

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

- A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation.
- The School will take advice from the three safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s).
- If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the three safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.
- Confidentiality will be an important consideration for the School and advice will be sought as necessary from the three safeguarding partners and/ or the police as appropriate.
- The School will have regard to the procedures set out in *KCS/E* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or DDSL) who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that 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; and whether a crime has been committed. Ultimately, the DSL (or DDSL) will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the BSCP referral process.

The School's approach to sexting is that staff who respond to a disclosure should remember not to use language that implies blame or judgment. Recognise the courage it has taken to speak up and reassure them that they have done the right thing by raising their concern. Let them know that you will need to pass on this information to the DSL and be clear that this is so that you can provide the best possible support for them. It is important to stay calm and keep the environment you are in as relaxed as possible, this will help to support the young person.

Step 1: If a device is involved - confiscate it and set it to flight mode or, if not possible, switch it off.
Step 2: Report to your DSL as soon as possible.

The DSL should hold an initial review meeting with appropriate school staff. The initial review meeting should consider the initial evidence and aim to establish whether there is an immediate risk to a young person or young people.

Factors that need to be considered are:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a chosen member of the Pastoral Team (e.g. a Head of Year, or Head of Section), and support from external agencies will be sought, as appropriate. Access to the school counselling service may also be offered.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (on CPOMS) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record (CPOMS) of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS), VOLUNTEERS AND CONTRACTORS

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at the Buckinghamshire Council.

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

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the policies section on Firefly. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and BSCP arrangements and applies when staff (including volunteers) have (or are alleged to have)

- 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 indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

<https://www.buckssafeguarding.org.uk/blog/2022/01/revised-lado-guidance-allegations/>

1.2 When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

- a. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head (OR if appropriate this can be delegated to the DSL). If an allegation is reported to the DSL, the DSL will inform the Head. Where the Head is absent or is the subject of the allegation, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors (and LADO).
- b. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to

meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

- c. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
- d. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- e. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved.

The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- 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 to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case

manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

1. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
2. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
3. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
4. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
5. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

6. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

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

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who

made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

PROCEDURE FOR MANAGING ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service

providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers)* (September 2023) and will seek assurance in this regard.

<https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice>

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

Detail regarding Low-Level Concerns which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour can be found in **Appendix 3**.

The School's staff code of conduct can be found in our staff information folder. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of

its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times. The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns section that can be found in **Appendix 3**. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors by email using cofg@stmarysgx.co.uk.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved, and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for seven years, or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Schools safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individuals employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For all appointments, an enhanced DBS check with “barred list” information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School’s wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

The School will ensure regulated activity determinations are undertaken in accordance with current legislation and KCSIE 2026 requirements, including revised arrangements relating to volunteers and supervised activities.

Where the School is subject to the Early Years Foundation Stage (EYFS) framework, volunteers must not begin working within EYFS settings until the School has received the volunteer's enhanced DBS certificate including barred list information.

No volunteer will be permitted to undertake activities within EYFS provision before these checks have been completed and reviewed by the School.

Full details of the School’s safer recruitment procedures for checking the suitability of staff, Governors, and volunteers to work with children and young people is set out in the School’s Recruitment Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Mairead Carney who is a member of the leadership team.

The DSL for the Prep Department is Mairead Carney, and the EYFS DSL is Rebecca Rose.

The School has a Safeguarding Team who are all considered as DDSL and the person(s) to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times. The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place. The DSL works with the governors to review and update the School's safeguarding policy.

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and in accordance with current KCSIE expectations. The DSL will ensure secure transfer and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

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

Escalation procedures will ensure staff can access a DSL or DDSL without delay whenever safeguarding concerns arise. A DSL or DDSL is always contactable during term time and during any period when the School is providing activities for children.

During term time, the DSL and/or a DDSL will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. The School will maintain robust contingency arrangements to ensure safeguarding leadership is available at all times, including during educational visits, residential visits, evenings, weekends and holiday activities. For out of hours/out of term activities, the School's arrangements are to have a duty rota for contact by external agencies (shared with ESAS). For internal contacts, a DSL or DDSL can be contacted immediately by telephone and in person where operationally possible.

The DSL (or DDSL) should liaise with the three safeguarding partners and work with other agencies in line with *WT. "NPCC When to call the police: guidance for schools and colleges"* (npcc.police.uk) can assist the DSL {or DDSL} to understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the DSL retains lead operational responsibility for safeguarding and child protection and this responsibility cannot be delegated, the Governing Body retains overall strategic responsibility for ensuring that safeguarding arrangements are effective, compliant and appropriately monitored throughout the School.

Full details of the DSL role can be found within the current edition of *Keeping Children Safe in Education*.

TRAINING

Induction and training are in line with advice from BSCP.

All Staff

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

- the Safeguarding (Child Protection) policy (including the policy and procedures to deal with child on child abuse)
- the role and identity of the DSL(s) and any DDSL
- the Behaviour Management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the Staff Code of Conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the Online Safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- the Safeguarding Response to Children who are Absent from Education, particularly on repeat occasions and/or prolonged periods or children missing education;
- a copy of Part One of *KCSIE*
- In addition to Part One, the School will ensure that staff read additional *KCSIE* sections and annexes relevant to their role and responsibilities, including Part Five where applicable.

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with the same documentation.

All staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via staff training.
- Understand key information contained in Part One of *KCSIE*. The School will ensure staff understanding by administering an online form.
- Receive training in safeguarding and child protection regularly, in line with advice from the BSCP. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
- Receive training on recognising and responding to prejudice-based harm, including racism, faith-targeted abuse and other forms of discriminatory behaviour, understanding that such behaviours may constitute safeguarding concerns in their own right and can significantly affect a child's welfare, wellbeing and sense of safety.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, e-bulletins, and staff meetings.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. In addition, the governing body complies with the DfE's Data Protection guidance for schools, ensuring school staff and governors know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

DSL(s)

Newly appointed DSLs will complete the Buckinghamshire DSL Training pathway, including the two-day Designated Safeguarding Lead Training followed by Safeguarding – The System and You, or equivalent training that meets Buckinghamshire's current requirements.

The DSL (and DDSLs) receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children training in the three safeguarding partners' approach to *Prevent* duties and harmful sexual behaviours. The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on Prevent matters and update them on relevant issues.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure. The DDSL Team is trained to the same level as the DSL.

The DSL and DDSLs will participate in regular professional safeguarding supervision and reflective practice opportunities appropriate to the nature of the role, to support effective decision-making, wellbeing and safeguarding practice.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christine Bayliss is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the governing body. The Safeguarding Governor will undertake safeguarding training including Prevent and Safer Recruitment training and will keep this training appropriately updated in accordance with national and local safeguarding requirements.

The Governing Body receives regular safeguarding assurance information and provides appropriate challenge to School leaders regarding safeguarding culture, record keeping, safeguarding referrals, allegations management, attendance concerns, filtering and monitoring systems, safer recruitment compliance and staff training. The Governing Body receives regular safeguarding assurance information and provides appropriate challenge to School leaders regarding safeguarding culture, record keeping, safeguarding referrals, allegations management, attendance concerns, filtering and monitoring systems, safer recruitment compliance and staff training. Governors satisfy themselves that safeguarding arrangements remain effective and that statutory duties are fulfilled.

The Governing Body also seeks assurance that the School promotes an inclusive and anti-discriminatory safeguarding culture and that incidents of racism, faith-targeted abuse and other discriminatory behaviour are identified, recorded, monitored and addressed appropriately.

The Safeguarding Governor will meet with the DSL at least termly to review and monitor the School's safeguarding arrangements, including the implementation of this policy, safeguarding training, the Single Central Record, safer recruitment arrangements, filtering and monitoring, and any relevant safeguarding audits.

The DSL will provide an Annual Safeguarding Report to the Governing Body, providing an overview of safeguarding activity, trends, emerging risks, training, referrals, allegations, attendance-related safeguarding concerns, contextual safeguarding and the effectiveness of safeguarding arrangements. A copy may be shared with the Buckinghamshire Education Safeguarding Advisory Service (ESAS) where requested or as part of local safeguarding support, monitoring or quality assurance arrangements.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The annual review involves a meeting with the DSL and Safeguarding governor and is reported back to the governing board. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

TEACHING CHILDREN HOW TO KEEP SAFE including Online Safety

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism. Pupils will be taught about risks associated with generative artificial intelligence (AI), manipulated content, deepfakes, online misinformation, disinformation and conspiracy theories. They will also be taught about the risks posed by adults or young people who use the internet and social media to bully, groom, abuse and radicalise. The School will support pupils to critically evaluate online information, recognise risks associated with AI generated content and understand how technology may be used to facilitate abuse, coercion, exploitation or harassment. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or

contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.

In curriculum and PSHE lessons pupils will be taught to recognise and critically evaluate:

- AI-generated content
- generative artificial intelligence tools
- manipulated media
- deepfakes
- misinformation
- disinformation
- conspiracy theories
- online grooming and coercion
- financial exploitation and online scams

The School will provide age-appropriate education regarding safe and responsible use of emerging technologies. The School will keep emerging technologies and associated safeguarding risks under review. This includes artificial intelligence tools, generative AI platforms, immersive technologies, evolving social media platforms and any technology capable of facilitating exploitation, coercion, abuse, grooming, misinformation, deepfake imagery, impersonation or harmful content.

FILTERING AND MONITORING

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the Schools IT system. The School's systems are Smoothwall, Impero and Senso. The Governing Body has identified a nominated governor with responsibility for oversight of filtering and monitoring arrangements. This governor receives safeguarding assurance regarding the effectiveness of filtering and monitoring systems and any significant safeguarding trends arising from their use.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Our Acceptable use policy and mobile devices policies aim to mitigate against this and regular spot checks are carried out to uncover abuses of these policies.

To ensure compliance with the DfE's filtering and monitoring standards for schools:

- The Governing Body will ensure filtering and monitoring systems are reviewed and documented at least annually, and sooner where safeguarding risk assessments indicate a need for review.
- Governance records of these reviews will be maintained.
- The DSL, Head, Governors and IT staff will clearly understand and fulfil their responsibilities regarding filtering and monitoring in accordance with DfE standards.

Further detail of the Schools policy and procedures in relation to online safety can be found in the School's Online Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

RELATIONSHIPS EDUCATION AND/OR RELATIONSHIPS AND SEX EDUCATION ("RSE")

The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.

The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* (2026) when making arrangements for and teaching RSE. RSE will form part of the School's PSHCEE programme.

LOOKED AFTER CHILDREN

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The School will appoint a named Designated Teacher for Looked After and Previously Looked After Children. The Designated Teacher will have appropriate training, knowledge and expertise to fulfil the role and will work closely with the DSL, Headteacher, Virtual School and relevant external agencies to promote the child's educational, safeguarding and welfare outcomes. Where appropriate, the DSL may also hold the Designated Teacher role.

We also recognise that students who have been adopted may have similar needs or presenting issues due to previous trauma or attachments issues. Therefore, the same procedure is followed for these students even if they are not identified by the LA as previously looked after.

The following responsibilities and duties are written with regard to:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf

ARRANGEMENTS FOR STUDENTS ATTENDING ALTERNATIVE PROVISION

Where a pupil attends Alternative Provision, St Mary's School retains overall responsibility for safeguarding and promoting the welfare of that pupil. The School will ensure that attendance is monitored daily and that the pupil is visited at the provision at appropriate intervals. The School will ensure that the curriculum is appropriate to the pupil's needs and that the provision has effective safeguarding and child protection arrangements. The School will retain documented evidence of attendance monitoring, safeguarding communication, site visits, provider quality assurance activity and review meetings

In line with the *Revised Alternative Provision Guidance (February 2025)*, the School obtains written confirmation that safer recruitment checks have been completed for staff working directly with St Mary's pupils. A record of all sites attended is kept.

Arrangements are in place to promptly follow up on all absences and for the school to be notified of any changes that could affect the child's safety or attendance.

Placements are reviewed regularly to confirm the provision remains suitable and safe, with immediate action taken if any safeguarding concerns arise.

ARRANGEMENTS FOR VISITING SPEAKERS

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy.

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

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

All visitors to the school, including visiting speakers, will be notified to the Head in advance and will be accompanied at all times whilst on the School site. Their ID is checked on arrival. All visitors receive safeguarding information including the identity of the DSL and DDSs, procedures for reporting a safeguarding concern, evacuation arrangements and expectations regarding visitor conduct whilst on site. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's External Visitors Procedure which is located in the Staff General Information document located in:

T:\Staff Info Book 2026-27\Routines and Duties\Senior House Staff General Information. The form to complete for visitor requests is located on Firefly: <https://stmarysgx.fireflycloud.net/admin-1/visitors-to-school-form->

ARRANGEMENTS FOR USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll. Each external individual or organisation that is responsible for the letting will be provided with the contact of a member of the Safeguarding Team.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (a lease or hire agreement) as a condition of use and occupation of the premises to include: explicit safeguarding obligations, safer recruitment expectations, DBS requirements where appropriate, allegation management processes, reporting procedures and expectations regarding staff conduct.

Failure to comply with safeguarding requirements may result in immediate termination of access to school premises.

Community users of the schools facilities and organising activities for children are aware of and understand the School's child protection guidelines and procedures, and our expectation of how they should maintain a safe environment which supports children's welfare and development by having appropriate safeguarding and child protection procedures in place. It is the responsibility of the governing body to ensure that safeguarding requirements are included in any transfer of control agreement. This includes the organisation signing a hire agreement acknowledging that if school receives an allegation related to that organisation or an individual, school must follow their own policies and procedures including informing the LADO. We reserve the right to decline access to use the school facilities where we believe their ethos or practice is not aligned with this policy.

Additionally, the school must see the up-to-date Child Protection Policy of any organisation hiring the School's facilities. We expect all lettings using the School Premises to follow Buckinghamshire

County Council procedures for managing allegations against staff and where necessary, the suspension of adults from school premises.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (2023) and '*After school clubs, community activities, and tuition*' (*safeguarding guidance for providers 2026*)

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

DISQUALIFICATION FROM WORKING IN CHILDCARE

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

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed or that we have seen and verified the documentation.

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

USE OF MOBILE PHONES AND CAMERAS

The School's policy on the use of mobile phones, cameras and Smart devices (including watches and glasses) in the setting can be found in the School's Acceptable Use Policy. For example, 'Staff are not permitted to use their personal mobile devices, cameras or Smart devices in School. Staff who wish to use take photographs or video of pupils (whether on a personal or School device) must first speak with their SLT or the Head to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in School for any other reason must first speak with the Head or their SLT Link. More information can be found in the Acceptable Use Policy. Staff who act in breach of this may be subject to disciplinary action. Parents and visitors are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Head of Prep.

DSL FOR THE EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Ms Rebecca Rose.

The School ensures that EYFS safeguarding arrangements remain aligned with the current EYFS Statutory Framework, KCSIE, Working Together to Safeguard Children and Buckinghamshire Safeguarding Children Partnership procedures.

All staff working within the EYFS are trained to understand safeguarding policies and procedures and are able to explain how they would respond to safeguarding concerns, allegations and disclosures. Safeguarding training is regularly updated in accordance with EYFS requirements.

The School ensures that all EYFS volunteers meet safer recruitment and DBS requirements before commencing work within the EYFS setting.

DUTY TO NOTIFY OFSTED

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

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore staff should always be vigilant and always raise any concerns with the DSL or a DDSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as “extra-familial harm.” Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around

chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL or DDSL.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are inadequate, worthless or unloved through persistent criticism, belittling or name-calling, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Faith-targeted abuse and racism: Racism, faith-targeted abuse and other forms of discriminatory behaviour can have a significant impact on a child's welfare, wellbeing and sense of safety. These incidents may occur in person or online and can cause emotional harm, social isolation and fear. Staff should treat such incidents seriously, record them appropriately and consider whether safeguarding action is required.

Sexual abuse: involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children are more likely than not to know the person who is abusing them. Sexual abuse can be perpetrated by adults or by other children.

A child under the age of 13 can never legally consent to any sexual activity.

Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and

assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, 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 or college.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
 - o children and young people selling nudes or semi-nudes of others online
 - o children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
 - o children and young people hacking a peer's account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger.

Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be

due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying

weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

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

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

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

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DdoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene

where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.

Mental health: all staff should be aware that 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency

statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL or DDSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

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

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bisexual or gender questioning : A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will have regard to the current legal framework, Keeping Children Safe in Education, Equality Act duties, safeguarding responsibilities and any applicable DfE guidance in force at the time. Decisions will be made on an individual basis, taking account of the child's wishes, welfare, safety, parental involvement where appropriate, and any relevant professional advice.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse. The DSL and DDSL have all completed the Operation Encompass Key Worker training.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to First Response where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the School's Missing Pupil or Attendance Policy. All unexplained absences will be followed up in accordance with this Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:

www.actionagainstabduction.org and www.clevernevergoes.org

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online

child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 2

Guidance for Staff on How to Deal with Disclosure

Information about possible abuse may come to a member of staff in several ways - direct allegation from a child that has been abused, through a friend, relative or other child, through a child's behaviour or through observation of an injury to the child.

If a teacher or other member of staff has concerns about any pupil or incident that touches upon child protection issues, he or she should report them as soon as possible to a Designated Safeguarding Lead (DSL). In the unlikely event that the DSL/Deputy DSL are not available staff must share their concerns with the most senior member of staff.

Pupils who have a problem may speak to someone whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A pupil who is insistent upon confidentiality should be referred to an external source, such as ChildLine (details are given in the Policy for Pupils on Confidentiality Issues). If the pupil is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the DSL with a written account of what has transpired as a matter of urgency.

If a pupil decides to speak to a member of staff about the fact that either she, or a pupil known to her, is being bullied, harassed or abused, the member of staff should:

- Ensure that the child is in a safe place and in receipt of support.
- React professionally, and remember that they are not carrying out an investigation, (which is a task for specialists)
- Take what the child says seriously, and calmly, without becoming emotionally involved
- Give the child time to build trust and confidence to speak

- The child should never be given the impression that they are creating a problem, or to feel shamed for making a report.

16

- Staff should reassure the child they are being taken seriously, they will be supported and kept safe.
- Make it clear why unconditional confidentiality cannot be offered, (drawing on the policy for pupils on confidentiality issues as necessary)
- Explain that any adult member of staff is obliged to inform the DSL making clear who that person is, if there are child protection or safeguarding issues involved, in order that specialist help can be arranged
- Encourage the pupil to speak directly to the DSL
- Explain that only those who have a professional “need to know” will be told, and, if appropriate, measures will be set up to protect the pupil from retaliation and further abuse
- Reassure the child that she was right to tell and that she is not to blame for having being bullied or abused
- Allow the child to tell her own story, without asking detailed or leading questions
- Defendants have been acquitted where leading questioning or inappropriate investigation has been proven. It is vital that subsequent enquiries should not be prejudiced by detailed questioning in school.
- Record what has been said, using the child’s words as a safeguarding concern on CPOMS. Make some very brief notes immediately after the interview and write them up fully as soon as possible. Keep your original notes in case a court requires them. Record date, time, place, any noticeable non-verbal behaviour and the actual words used by the girl. Be objective: include statements and observable things, rather than your interpretations or assumptions. Fact not opinion. Use the diagram on CPOMS or draw a diagram to indicate the position of any bruising. The report should be signed and dated, and state the member of staff’s position in the school.
- Inform the DSL as soon as possible - at least by the end of the morning/afternoon session of that day
- Inform the Head immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the school, or on a school trip. (If the Head is unavailable – or is involved - the Chairman of Governors should be told immediately. Contact details may be obtained in confidence from the Bursar).
- Remember your own support needs and ensure that you receive this support without compromising the confidentiality of the girl with colleagues.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of

developing one and pass this information onto the DSL or, if available, to a member of staff who is trained as DMHL (Designated Mental Health Lead).

If there is immediate risk of harm to a child, DSL/staff will not delay and call 999. The DSL must then notify First Response of the situation and what action has been taken.

If a child needs urgent medical attention, the DSL will call for an ambulance by calling 999. They will then contact First Response for advice about informing parents/carers.

If there are non-urgent signs of physical injury, that may (or may not) be the result of abuse or bullying, medical help should be summoned, or the pupil should be taken to the medical room.

If there are sufficient grounds for suspecting significant harm, a referral will be made to First Response and the Police if it is appropriate. The rationale for this decision should be recorded by the DSL.

The DSL will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, carers, First Response, Police or other agencies involved to identify the action or support strategies that will be appropriate. If the member of staff is concerned that the appropriate action has not been taken they should liaise with the DSL and if necessary make a referral to First Response themselves. Staff acknowledge that safeguarding responsibility does not end once they have informed the DSL of any concerns, although specific details of further actions may be appropriately withheld by the DSL as information will only be shared on a need-to-know basis.

Following a disclosure, the child will be accompanied and supported at all times until a plan is agreed as to how best they can be safeguarded.

REMEMBER TED

Tell me

Explain to me

Describe to me

- Your aim should be to establish as quickly and accurately as possible the details of the injury or abuse. Questioning should be brief and gentle using open rather than closed questions ("How did it happen?" rather than "Did [] hit you?").
- Tell me more about....
- Can you Explain how that happened, how you felt?
- Describe what happened
- Keep a note of what you heard and saw.
- BETTER STILL with care and sensitivity, pass the pupil to the DSL immediately.

APPENDIX 3

Allegations that do not Meet the Harms Threshold (LOW-LEVEL CONCERNS)

If the allegation is considered 'low level' and does not meet the relevant section of KCSIE 2026 concerning low-level concerns, the Head will take appropriate action and/or follow disciplinary procedures to address the behaviour.

A low-level concern is 'any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.
- Humiliating children

Low level concerns should be reported directly to the Head regardless of whether the person concerned is permanent staff, temporary, volunteer or a contractor. Staff should feel confident to self-refer. If the member of staff is from a supply agency or contractor the concern should be recorded and their employer should be notified.

Procedure

1. If there is any doubt about whether the information which has been shared meets the harms threshold, the Head will consult the LADO.
2. The Head will speak directly to the person who raised the concern, and then to any individuals involved and any witness.
3. The Head may involve the DSL as appropriate
4. A decision will be made categorising the type of behaviour
5. Meeting with the member of staff concerned to share the nature of the decision and any subsequent actions or training requirements

The member of staff will be given support and/or training as appropriate. Employers of agency staff or contractors will be informed.

The head should record all low-level concerns in writing. This should include:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken; the rationale for decisions and action taken;

- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

Their records must be kept confidential and comply with GDPR and the Data Protection Act 2018. They should be reviewed regularly so that any potential patterns concerning problematic or inappropriate behaviour can be identified. Also, to identify if the problematic behaviour moves from being a low-level concern to meeting the harms threshold, in which case the LADO will be informed. These records will be retained for seven years, or until the individual has left employment, whichever is longer.

Patterns of behaviour will also be monitored to see if there is a cultural issue within school that needs addressing. Extra training will be delivered as required, and improvements will be made to the staff code of conduct and safeguarding procedures as necessary and shared with all staff.

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.