Sir John Hunt Community Sports College

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

Approved by:	SJH SLT	**Date:** 01 September 2025
Last reviewed on:	01 September 2025	
Next review due by:	SJH FGB September 2026	

Contents

PART A

1. Application

This Safeguarding Policy & Procedures contains the Policy and Procedures for Child Protection and Safeguarding for our school, in accordance with DfE statutory guidance and regulations and current legislation (see appendix).

It applies to all paid and unpaid staff, volunteers, governors, and all contractors and other people using or visiting any of the premises of the Trust or its schools, must abide by this Safeguarding Policy.

It is the responsibility of the Governing Body and Headteacher of the school to ensure that staff and visitors adhere to this policy.

In implementing this policy all staff and governors must take account of any advice given to them by the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead.

If there is any question or doubt about the interpretation or implementation of this Policy the DSL and Principal should be consulted.

1.2 Monitoring arrangements

This policy will be reviewed annually by the DSL. At every review, it will be approved by the Governors. Following the draft KCSIE guidance this policy has been amended August 2025 and will be finalised following the final publication in September 2025

1.3 Approval and review

- Maintenance of this Policy is the responsibility of the Designated Safeguarding Lead.
- Minor amendments were made to reflect updated guidance on: August 2025
- This Policy was agreed by the Chair of Governors on 12 September 2025
- This Policy is due for annual review by: Annually September 2026 following final publication of KCSIE 2026

1.4. Associated policies and procedures

The following policies are directly related to and complement this Safeguarding Policy & Procedures:
- GLT Student Welfare Statement
- School Conduct for Learning Policy and Procedures
- School Attendance Policy
- School Relationships and sex education policy
- Health and Safety Policy and Procedures
- Information Security Policy, Data Protection and Data Retention Policy
- School compliments and Complaints Procedures
- Staff and Governors' Codes of Conduct
- HR, Recruitment and Selection, and disciplinary policies and procedures
- Staff Whistle-blowing Policy.
- Guidance on Visitors to School Sites
- Volunteer Guidance

1.5 Important contacts - School

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Mr O Marner (Assistant Principal)	01752 201020 Ext. 205/ 07966 235690 O.marner@sjhcsc.co.uk
Deputy DSLs	Mrs C Couling	01752 201020 Ext. 301
	Mrs N Davies	01752 201020 Ext. 306
Safeguarding team	Mr S Walton	01752 201020 Ext. 304
Principal	Mrs J Bevan	J.Bevan@sjhcsc.co.uk
Chair of governors	Ms C Jane	clerkwpsjh@SirJohnHunt.onmicrosoft.com
Safeguarding link governor	Miss G Melley	clerkwpsjh@SirJohnHunt.onmicrosoft.com

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Local authority designated officer (LADO)	S Parma	01752 304 769 07866 892 851 LADO@Plymouth.gov.uk
Plymouth Children's Social Care		01752 668000 – Option 1 MASH@Plymouth.gov.uk
Plymouth Social Care 'out of hours' team		01752 668000 Select Children's Services – Option 1
PCC Service Manager Inclusion & Welfare	Beth Williams	01752308908 beth.williams@plymouth.gov.uk
NSPCC Helpline		0808 800 5000
Channel helpline		020 7340 7264

PART B - Policy

2.1. Principles - "The welfare of the child is paramount"

The Board of Governors of Sir John Hunt places the highest importance on its duty to safeguard and promote the welfare and safety of all children in its care.

'The Board' believes that safeguarding and promoting the welfare of children is everyone's responsibility. The term 'child' or 'children' relates to anyone under the age of 18. Everyone who comes into contact with children and their families and carers has a role to play. The Board is committed to safeguarding and promoting the welfare of children by the provision of a safe environment in which children can learn. The Board recognises that safeguarding now includes protecting children from harmful online influences such as **misinformation, disinformation, conspiracy theories, and inappropriate or unsafe use of generative artificial intelligence (AI)**. These issues will be addressed in staff training, curriculum planning, and online safety procedures. All people working with children and visiting school premises must be aware that children may be at risk of abuse, neglect and exploitation are well placed to observe signs of abuse, have a duty to protect children from abuse, neglect and exploitation and have a responsibility to identify and report child welfare concerns and take appropriate action, acting on concerns about a child's welfare immediately, in association with other staff and volunteers, visitors, families and other agencies.

All staff and volunteers have a responsibility to provide a safe environment in which children can learn and should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child and fulfil their legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.

The Board recognises that all schools also play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by the school's:
- Conduct for Learning policy and procedures

- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly in an age appropriate context
- The Board will annually review filtering, monitoring and cyber-security arrangements to ensure that its cyber-security provision meets the latest DfE standards.

Safeguarding and promoting the welfare of children is defined for the purposes of this Policy as:
- 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.
- providing help and support to meet the needs of children as soon as problems emerge.

Children includes everyone under the age of 18 (Education Act 2002 and Children Act 1989).

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

The Board and the school will give special consideration to children who:
- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are Children in Care
- Are missing from education
- Have unexplainable and/or persistent absences from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

The Trust and its schools will ensure that children feel safe and comfortable to come forward and report any concerns and/or allegations through:
- Having systems in place for children to confidently report abuse and ensuring that their views are taken into account
- Ensuring reporting systems are well promoted, easily understood and easily accessible for children
- Making it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

The Board and the school recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under the behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- Is serious, and potentially a criminal offence
- Could put children in the school at risk
- Is violent
- Involves children being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

This Policy and Procedures also apply to extended school and off-site activities including the safeguarding of children who attend Alternative Provisions.

2.2. Definitions

Safeguarding and promoting the welfare of children means:
- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Providing help and support to meet the needs of children as soon as problems emerge.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Contextual Safeguarding The approach to understanding and responding to young people's experiences of significant harm beyond their families.

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

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

Exploitation is when someone uses a child for financial gain, sexual gratification, labour or personal advantage. **Sharing of nudes** and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following **three safeguarding partners** are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

This policy is consistent with the procedures of the three safeguarding partners.

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

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

2.3. Terminology

- **The Board** means the Governing Body of Sir John Hunt Community College.
- **School** means Sir John Hunt Community College.
- **Headteacher** means the headteacher or principal of the school.
- **Governors** includes governors
- **Governing Body** means the committee of the Board of Governors who have delegated appropriate powers and functions relating to the governance of the school.
- **The DSL** means Designated Safeguarding Lead of the School.
- **DDSL** means the Deputy Designated Safeguarding Lead of the School.
- **Staff** means paid and unpaid staff with a contract of employment with the school.
- **Volunteer** means volunteers working in College premises or with children on the roll of the College under some form of agreement with the school; volunteers are covered by the category of 'staff' unless explicitly stated.
- **Visitors** means casual visitors to and users of the premises, including people working with children on a voluntary basis not covered by the category of formal 'volunteer'
- **Contractors** means people working in College premises under a formal contract with an external organisation.

3. Roles and responsibilities

3.1 Governing Bodies

The Governing Body of each school in GLT, in their role as delegated committees of the Board of Trustees, will:
- Have oversight of the safeguarding arrangements of their school(s) within the Trust.
- Complete safeguarding training in line with the current version of Keeping Children Safe in Education.
- Appoint a Link Governor for safeguarding who will meet with the school DSL to review process and procedure and report to the Governing Body.
- Receive and consider reports from the Headteacher/DSL/Link Governor relating to significant safeguarding concerns, actions, trends and outcomes.
- Receive the annual safeguarding report for their school and note any actions arising from it.
- Refer any concerns with regard to safeguarding to the GLT Board of Trustees.
- Ensure that safeguarding oversight includes scrutiny of how the school is addressing specific risks such as online harm, mental health, and child exploitation as identified in KCSIE 2025.

3.2 The Headteacher

The Headteacher of each school will ensure that:
- Staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- The DSL and other staff undertake appropriate safeguarding and child protection training.

- At least one member of an appointed recruitment panel will have undertaken appropriate safer recruitment training.
- The DSL is keeping up to date records of staff training.
- The school's Single Central Record is maintained and accurate, spot checks may be delegated to the DSL if appropriate.
- This policy is communicated to parents/carers when their child joins the school and via the school website.
- The DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- There are regular checks/ quality assurance on the recording of the rationale and decision making of the DSL.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 2 of this policy covers this procedure.
- They act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2).
- They make decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this. These decisions are stored in a secure area and remain confidential.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
    - The responsibility for safeguarding all children in Alternative Provision remains with the school. The HT will direct the DSL to attend meetings and work collaboratively with the provider ensuring nothing is missed.
- Safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- The DSL is ensuring accurate records are kept within the child protection online monitoring system.
- The relevant staffing ratios are met, where applicable.
- A designated teacher is in place to support the educational achievement of children in care.
- An annual safeguarding report is prepared and presented to the School Governing Body.
- Learners are taught about safeguarding within the curriculum in compliance with statutory guidelines.
- Ensure that the curriculum covers up-to-date safeguarding topics including online safety, mental health awareness, and the risks of misinformation, disinformation, and conspiracy theories as outlined in KCSIE 2025

3.3 The School Designated Safeguarding Lead (DSL)

The School Designated Safeguarding Lead (DSL) will be a member of the school senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours if necessary using the details above. When the DSL is absent, the Deputy DSL will act as cover.

The DSL will:
- Provide advice and support to other staff on child welfare and child protection matters and keep the Headteacher informed of any issues.
- Ensure that all staff undertake appropriate safeguarding and child protection training, at induction, through safeguarding updates and regular CPD. This includes training in online safety, and their role and responsibilities in relation to filtering and monitoring.
- Ensure all staff are aware of their local early help process and understand their role in it.
- Ensure all staff are aware of the process for the DSL making referrals to the local authority children's social care for statutory assessments under the Children ACT 1989 section 17 and section 47.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Ensure accurate records are kept within the child protection online monitoring system.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Ensure the successful transfer of the safeguarding/child protection file when a learner moves to a new setting within 5 days of transfer or the first 5 days of the start of a new term.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Inform the headteacher of any enquiries under section 47 of the children's act and any police investigations. This includes the awareness of the requirement that all children have an appropriate adult to support and help them in the case of a police investigation or search.
- Take the lead and responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that learners are experiencing or have experienced and identifying the impact that these issues may have on learners' attendance, engagement and achievement.
- Record rationale around decision making including the decision not to make a referral.
- Ensure there is appropriate safeguarding cover during term time including out of hours activities run by the school.
- Take lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place.
- Maintain awareness of updated KCSIE 2025 guidance on child-on-child abuse, including identifying, responding to, and preventing harmful sexual behaviours and serious violence.
- Ensure training includes understanding of the impact of domestic abuse, mental health concerns, and risks associated with modern technology and social media.

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

3.4 All staff

All staff will recognise that safeguarding and promoting the welfare of children is everyone's responsibility and:

- Each year, read and understand part 1 and annex A. of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education. Staff who work directly with children will also read annex B.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will ensure that they understand:

- The school systems which support safeguarding, including this Child Protection and Safeguarding Policy, and any local procedures according to their place of work
- The Staff Code of Conduct,
- The role and identity of the designated safeguarding lead (DSL) and [deputy/deputies] of the school
- The Behaviour Policy and Behaviour Procedures as relevant to their place of work
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- How to identify vulnerable learners and what action to take to keep them safe, including learners who may benefit from early help intervention
- How to ensure that information or concerns about learners will be shared with the DSL, including recording concerns appropriately and in a timely manner using the online child protection system.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online (contextual safeguarding)
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children.
- What to look for to identify children who need help or protection
- The additional safeguarding risks highlighted in KCSIE 2025, including the impact of misinformation and disinformation, mental health, and increased risks posed by online environments and social media platforms

4. Confidentiality

All staff should understand that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, although in most circumstances data will not be shared unless a data release form is completed.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- DSLs and staff should also be aware of the updated guidance regarding the sharing of information around serious violence and the potential safeguarding implications.

Regarding anonymity, all staff will:

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Understand that there may be times when it is necessary to share information without consent such as when:
    - To gain consent would place the child at risk
    - To gain consent would compromise a criminal investigation
    - It cannot be reasonably expected to gain consent
- Know that there is no obligation for a school to disclose the information to the police that could incriminate a person in an offence <u>but</u> that it is an offence to knowingly impede the apprehension of a person who is committing an arrestable offence. The DSL will work with the police, child and parents (if relevant) to ensure information is disclosed in a timely but informed manner
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- Speak to the DSL (or DDSL) if they are in any doubt about sharing information

Specifically, the DSL should understand that:
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Parents or carers should normally be informed of a safeguarding concern (unless this would put the victim at greater risk)
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- They should consider the government's <u>information sharing advice for safeguarding practitioners</u> includes 7 'golden rules' for sharing information, and support staff who have to make decisions about sharing information

In the serious harm test under data protection legislation, there are occasions where a child's data will not be shared - in such circumstances the DSL will seek legal advice.

Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in the appendix.

5. Complaints and concerns about school safeguarding policies

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

5.2 Other complaints
In the first instance, other complaints should be made through our compliments and concerns policy.

5.3 Whistleblowing
Details of Staff Whistle-blowing procedures can be found in the Staff Whistle-blowing Policy.

Part C1 - Procedures for recognising abuse and taking action

All paid and unpaid staff, volunteers, governors of the school, and all contractors and other people using or visiting any of the premises must follow the procedures set out below in the event that they have a safeguarding concern.

Please note – in section 6.1 to 6.8, you should take any references to the DSL to mean the School Designated Safeguarding Lead (and DDSL to mean the School Deputy Designated Safeguarding Lead) . In all circumstances inform the School DSL of any safeguarding concerns at the earliest opportunity and in their absence the School DDSL or a member of the School Safeguarding team.

6.1 If a child makes a disclosure to you

You should:
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Record all information on the child protection online monitoring system. These recordings should include all concerns, discussions and decisions made including the rationale for those decisions.
- Bear in mind that some children may:
  - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - Not recognise their experiences as harmful
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
  But none of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.
- Ensure that any concerns related to online harm, such as exploitation via social media or gaming platforms, are reported promptly and escalated appropriately.
- Take extra care to follow procedures when concerns relate to children with disabilities or special educational needs, recognising the increased vulnerability.

6.2 If you believe a child is suffering or likely to suffer harm, or in immediate danger

You should:

- Inform the DSL at the earliest opportunity. In their absence inform the DDSL or a member of the Safeguarding team.
- If you are unable to contact the DSL, DDSL or member of the safeguarding team, you are able to make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.
- Tell the DSL as soon as possible if it is essential you make a referral directly.
- Follow your local procedures for making a referral, as per the arrangements put in place by the three safeguarding partners or use the following link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

6.3 If you discover that FGM has taken place or a pupil may be at risk of FGM

You should:

- Inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team, who will support you to report this to the police.
- Understand that a member of staff who either is informed by a girl under 18 that an act of FGM has been carried out on her or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth <u>must immediately report this to the police, personally.</u>
- Understand that this is a mandatory statutory duty, and staff will face disciplinary sanctions for failing to meet it.
- Then also inform the DSL who should involve children's social care (unless you have been specifically told by the police not to disclose).

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

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

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

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

You should:
- Where possible, inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the wider safeguarding team, or senior leadership team, and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.
- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

- If you need to make a referral directly, you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

6.5 If you are concerned about a child who you think may be vulnerable to being drawn into extremist activity

You should:
- If a child is not suffering or likely to suffer from harm, or in immediate danger, inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.
- If necessary, make a referral to local authority children's social care directly. Inform the DSL or deputy as soon as practically possible after the referral.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Further information: Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include, if the individual gives consent, Channel, the government's programme for identifying and supporting individuals vulnerable to being drawn into terrorism, or the local authority children's social care team. Help is to be provided to meet the needs of the children as soon as problems emerge.

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

6.6 If you have a mental health concern about a child

You should:
- Raise your concern with the DSL, and if appropriate the relevant pastoral staff member including the attendance officer if attendance is impacted.
- Understand 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.
- Take immediate action (as above) if you have a concern about a child's mental health that is also a safeguarding concern.
- Seek support from emergency services, via 999, if the learner is at risk of immediate harm.

6.7 If you have concerns about abuse made by pupils against other pupils (child on child harm)

You should:

- Inform the DSL at the earliest opportunity, or in their absence the DDSL or a member of the Safeguarding team.
- Record the allegation on the online system.
- Know that it is not your responsibility to investigate it.

6.8 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos - *also known as 'sexting' or 'youth produced sexual imagery'*

you should:
- Inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- Explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

You must NOT:
- View, copy, print, share, store or save the imagery yourself (unless the DSL has requested your support with doing this - for example if you are a member of the IT team).
- Ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Please note – in section 6.9:

- *If the concern is about a member of staff, volunteer or contractor in a school you should take any references to the DSL to mean the School Designated Safeguarding Lead (and DDSL to mean the School Deputy Designated Safeguarding Lead). In all circumstances inform the School DSL of any safeguarding concerns at the earliest opportunity and in their absence the School DDSL or a member of the School Safeguarding team.*
- *If the concern is about a member of staff, volunteer you should take any references to the DSL to mean the Designated Safeguarding Lead (and DDSL to mean the Deputy Designated Safeguarding Lead) . In all circumstances inform the DSL of any safeguarding concerns at the earliest opportunity and in their absence the DDSL.*

6.9 If you have concerns about a staff member, supply teacher, volunteer or contractor

You should:
- Understand that if these concerns are that a criminal offence against or related to a child may have been committed or that a person may not be suitable to work with children, or has behaved in a way that indicates they may pose a risk of harm to children, this must be reported urgently and should not be discussed with the individual it concerns.

  - If the concerns/allegations are about a member of school staff other than the Headteacher, this must be reported to the Headteacher.

- If the concerns/allegations are about the Headteacher or are about a member of GLT Shared Services staff, this must be reported to the Sir John Hunt Chair of Governors.
- If you feel there is a conflict of interest in reporting a concern or allegation about a member of staff to the appropriate person, it can be escalated to the next appropriate person or can be reported directly to the local authority designated officer (LADO).

Where appropriate, the Headteacher will ensure that the LADO is informed of the allegation and appropriate actions are taken within the necessary timescale (see appendix for more detail).

Part C2 - Procedures for schools

Please note: Headteachers must ensure that the procedures set out in sections 7.1 - 7.6 below are followed in their schools.

7.1 Children attending Alternative Provision

The Board is committed to ensuring that all pupils, regardless of their place of education, are safe, supported, and provided with a high-quality educational experience. In line with KCSIE 2025. The Board continues to strengthen all practices around Alternative Provision, ensuring robust safeguarding is at the heart of all decisions.

Safeguarding in Alternative Provision Settings (In Line with KCSIE 2025)

This section outlines the responsibilities for safeguarding pupils who are placed in Alternative Provision (AP), in line with the statutory guidance set out in *Keeping Children Safe in Education (KCSIE) 2025*. It aims to ensure the safety, well-being, and educational quality for all students, including those who are educated off-site.

- Alternative Provision refers to education arranged by local authorities or schools for pupils who, because of exclusion, illness, or other reasons, would not otherwise receive suitable education. This can include part-time placements, managed moves, or placements in specialist settings for behavioural or medical needs.

A. Responsibilities of the School or Setting

The Headteacher, Designated Safeguarding Lead (DSL), and governing body have clear responsibilities under KCSIE 2025 when commissioning and managing Alternative Provision placements:

- Before Placement- Carry out thorough due diligence on the AP provider. This includes: Safeguarding policies and procedures. Safer recruitment practices. Availability of a trained DSL. Health and safety arrangements. Insurance and risk assessments. Ensure written agreements are in place outlining:
  Roles and responsibilities. Communication protocols. Reporting processes for safeguarding or welfare concerns. The school will obtain written confirmation of safeguarding checks for all AP staff, be notified of staffing changes, track pupil location including subcontracted sites, and review placements at least half-termly, ending placements if safeguarding cannot be assured.

- During Placement- Maintain frequent contact with the pupil, with regular documented welfare check-ins.
  Monitor the pupil's attendance, behaviour, engagement, and well-being. Conduct termly

reviews of the placement, involving the pupil and parents/carers where appropriate.
Ensure the AP provider promptly reports any safeguarding concerns to the commissioning school's DSL and/or local authority as appropriate. Where pupils attend Alternative Provision, the school will obtain written confirmation of safeguarding checks for all AP staff, be notified of staffing changes, track pupil location including subcontracted sites, and review placements at least half-termly, ending placements if safeguarding cannot be assured.

B. Designated Safeguarding Lead (DSL) responsibilities

The DSL remains ultimately responsible for safeguarding all pupils, including those placed in AP.
The DSL Must maintain a clear safeguarding record of each pupil in AP, updated with any relevant concerns or incidents.
The DSL Must liaise with the AP DSL (if applicable) and ensure appropriate referrals are made if concerns arise.

C. Record Keeping and Monitoring

All safeguarding concerns, placement reviews, and communication with the AP provider must be accurately logged and retained in line with our safeguarding recording systems. The safeguarding governor will review this area as part of regular safeguarding audits.

D. Staff Training

All staff involved in commissioning, monitoring, or supporting pupils in Alternative Provision will receive specific training on the latest KCSIE requirements, including understanding risk factors, trauma-informed practice, and maintaining effective communication with AP settings.

E. Voice of the Child

Pupils placed in AP must be regularly consulted on their experience, safety, and support needs. Staff must ensure the pupil feels heard and supported, with appropriate action taken where concerns are raised.

7.2 Online safety and the use of mobile technology

Technology is a significant component in many safeguarding and wellbeing issues. In order to safeguard children from potentially harmful and inappropriate online material, the Headteacher will ensure that the school:

- Has robust processes in place to ensure the online safety of children, staff, volunteers and governors.
- Protects and educates the whole school community in its safe and responsible use of technology, including mobile and smart technology.
- Sets clear guidelines for the use of mobile phones for the whole school community.
- Establishes clear mechanisms, including the Smoothwall monitoring system and NetSupport DNA. Smoothwall provides filtering and monitoring between 7am and 6pm during term time, to identify, intervene in and escalate any incidents or concerns, where appropriate. These concerns are linked to the schools online child protection reporting system.
- Educates children about online safety as part of the curriculum. For example:
  - The safe use of social media, Artificial intelligence, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

- Trains staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, artificial intelligence and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Staff will be trained to recognise and respond to harmful content including misinformation, disinformation, conspiracy theories, and risks arising from the misuse of generative AI. Filtering and monitoring will be assessed using the DfE 'Plan Technology for Your School' tool, and cyber security measures will meet DfE standards." Staff will understand the role of Filtering and monitoring systems in keeping children safe.
- Educates parents/carers about online safety and shares clear procedures with them so they know how to raise concerns about online safety.
- Ensures staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Ensures all staff, children and parents/carers are aware that staff have the power to search children's phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Uses the preferred filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the school's IT systems.
- The College will stay informed about emerging online risks, new platforms, and digital trends, updating safeguarding approaches accordingly.

The DSL has oversight of and monitors the school's filtering and monitoring systems and ensures that they are linked to the online child protection system. Filtering and monitoring systems are reviewed annually by the DSL. The DSL is responsible for staff training, which includes training on staff roles and responsibilities in relation to filtering and monitoring.

The 4 key categories of risk
The approach to online safety is based on addressing the following categories of risk:
- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

7.3 Notifying parents or carers of safeguarding concerns

The DSL will determine whether it is appropriate for any concerns about a child to be discussed with the child's parents or carers, or other appropriate persons.

The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If notifying the parents or carers could increase the risk to the child, the concern will be discussed with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the parents or carers of all the children involved will usually be notified by the DSL if appropriate and safe to do so. This will be in conjunction with

the police and/or local authority children's social care to make sure the approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis) implement and share a safety plan for all parties involved in the incident.

7.4 Children with special educational needs, disabilities or health issues
Children with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

When required, the Headteacher will ensure that their school provides additional pastoral support for these children, including helping children overcome any communication barriers they face. Any abuse involving children with SEND involves close liaison between the DSL (or deputy) and the SENCO.

7.5 Children with a social worker

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

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

If a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about suspensions from school, and responding to unauthorised absence or missing education where there are known safeguarding risks and the provision of pastoral and/or academic support.

If a DSL wishes to raise concerns regarding the child's social worker, this should be escalated through the relevant local authority.

7.6 Children in Care (CIC) (previously Looked After Children - LAC)

The designated teacher in each school will ensure that staff have the skills, knowledge and understanding to keep Children in Care safe. In particular, appropriate staff will have relevant information about children's legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The designated teacher will have details of children's social workers and relevant virtual school heads.

The designated teacher is responsible for promoting the educational achievement of children in care in line with statutory guidance.

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

As part of their role, the designated teacher will:
- Work closely with the DSL and wider Safeguarding Team to ensure that any safeguarding concerns regarding children in care are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of children in care, including discussing how pupil premium plus funding can be best used to support children in care and meet the needs identified in their personal education plans.
- The Designated Teacher will work with the Virtual School Head to promote the educational achievement of Children in Care and, in line with non-statutory guidance, children in kinship care arrangements."

Please note:
- ***The Headteacher must ensure that the procedures set out in section 7.6 - 7.10 below are followed in their school.***

7.7 Record-keeping

The Headteacher will ensure that all safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded in writing.
Records will include:
- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- The decision making process including How and Why the outcome for action/ intervention was reached. Rationale is to be included even if the decision was not to refer.

The DSL will review information entered by all staff on the online monitoring system.
The DSL will provide robust training at least annually with regards to reliable recording and information sharing.

Concerns and referrals, either electronic or paper, will be kept in a separate child protection file for each child.

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:
- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The DSL will use the CPOMS categories when recording a concern.
The DSL has the responsibility of ensuring staff who allocate categories have a clear understanding of the definition for each category to enable representative and valid data to be collected.

7.7 Information Sharing
Information is shared with other agencies in line with local safeguarding procedures and the SJH Data Protection Policy.

Records are stored and retained in line with the SJH Information Security Policy and the SJH Data Retention Policy

Information sharing is guided by following the 7 Golden Rules as defined in DFE Information sharing advice May 2024.
1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person (s) failing to protect them.
2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer (s), and explain who you intend to share the information with, what information you will be sharing and why.
3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.
4. Seek advice promptly from the DSL whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.
5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g the child, a carer, a neighbour, or a colleague) who might suffer if their details become known to an abuser or one of their associates.
6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in Safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.
7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.

7.8 Training

7.8i All staff
All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety. Training will address the dangers of misinformation, disinformation, conspiracy theories, and harmful online challenges. Content of this training will ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect.

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

- Have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, at least every two years to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually.

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

Volunteers will receive appropriate training.

7.8ii The DSL and [deputy/deputies]
The DSL and [deputy/deputies] will undertake child protection and safeguarding level three training at least every 2 years. This is provided by the Local Authority to ensure it includes information on local contextual safeguarding. The DSL will use a contextual safeguarding approach gained through relevant training to understand and respond to risks beyond the school environment and within their school community. The DSL and/or the DDSL will attend the annual GLT Safeguarding conference and termly Trust Network meetings.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). The DSL will read (and share with the appropriate school staff) the GLT termly safeguarding bulletin and access further training though the school improvement safeguarding lead.

They will also undertake Prevent awareness training.

7.9 Recruitment and selection of staff and volunteers

In the recruitment and selection of staff and volunteers the College will at all times adhere to Recruitment and Selection policies and procedures, and to Keeping Children Safe in Education. At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education.
For more information about safer recruitment procedures please refer to the Safer Recruitment Policy. The College will use the DfE's 'Check a teacher's record' service and GOV.UK guidance for Section 128 checks."
In all job descriptions a clear statement about the safeguarding responsibilities of the post holder will be included.
The risks of individuals' behaviours outside work, including online activity, and how this might impact safeguarding will be considered during the recruitment process.

7.10 Guidance for Visitors to the School Site & Volunteers

Headteachers should ensure that the Guidance on Visitors to the School Site and Volunteer Guidance is followed in their school.

Section D: further information and guidance regarding specific safeguarding issues

Further information for all staff

D.1. Children absent or missing from education

A child who is absent from or missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. Attendance concerns will be assessed for safeguarding risk and escalated promptly in line with statutory duties. Working Together to Improve School Attendance September 2025.

There are many circumstances where a child may become absent or missing from education, but some children are particularly at risk. These include children who:
- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

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

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

D.2. Child criminal exploitation

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

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

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

Indicators of CCE can include a child:
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol

- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. The School DSL will work in collaboration with multi agencies to provide additional support to help keep the child in education.

D.3 Child sexual exploitation
Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the child who has been harmed needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

In addition to the CCE indicators above, indicators of CSE can include a child:
- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant
- If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

D.4 Child-on-child abuse
Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two.
GLT has a zero-tolerance approach to sexual violence and sexual harassment. Even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:
- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the child who has been harmed humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures as set out in this policy.

When considering instances of harmful sexual behaviour between children, their ages and stages of development will be considered. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will be offered appropriate support.

Process for managing incidents of child on child abuse:
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and safety plan into place for all children involved (including the child who has been harmed, the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a child who has been harmed or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Concerns about foster carers or anyone in a position of trust working or volunteering with children should be referred to the LADO by the DSL on the day that the allegation is reported. The setting should not undertake any investigation unless advised by the LADO.
- The school will ensure appropriate specialist support is available for victims and perpetrators, and liaise with external agencies as required to provide this support.
- Any online forms of child-on-child abuse, such as sharing of indecent images or online harassment, will be treated seriously and addressed promptly.

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

Taking proactive action to minimise the risk of child-on-child abuse, and creating a supportive environment where the child who has been harmed can feel confident in reporting incidents is essential. To achieve this, Headteachers will ensure that curriculums help to educate pupils about appropriate behaviour and consent and pupils are able to easily and confidently report abuse.

And the Headteacher will ensure all staff:
- Are alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area
- Support children who have witnessed sexual violence, especially rape or assault by penetration and ensure the child who has been harmed, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- reassure the child who has been harmed that they are being taken seriously
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Are vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- Are aware that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- Act immediately if they have any concerns about a child's welfare, rather than wait to be told
- Are aware that a child who has been harmed may not always make a direct report. For example: children can show signs or act in ways they hope adults will notice and react, or a friend may make a report, a member of staff may overhear a conversation or a child's behaviour might indicate that something is wrong.
- Recognise that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation. A pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Recognise the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- Recognise that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the child who has been harmed, the alleged perpetrator(s) and friends from either side
- Are aware of relevant safety plans/ risk assessments for the children that are regularly reviewed, shared with relevant parties and updated

Investigation and disciplinary action in response to child-on-child abuse
The DSL will take the lead role in any disciplining of the alleged perpetrator(s) and will provide support at the same time as taking any disciplinary action. Any sanctions will work alongside this, providing the necessary support for the alleged perpetrator (s). The rationale for the incident must demonstrate there has been a thorough investigation, there has been support put in place for all involved, the children have been educated within the dangers of the situation and there have been appropriate sanctions put in place. Investigate/Educate/Support and Sanction.
Disciplinary action (Sanctions) can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent schools from coming to their own conclusion about what happened and imposing a penalty accordingly. Matters will be considered on a case-by-case basis, taking into account whether:
- Taking action would prejudice an investigation and/or subsequent prosecution, liaising with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational to continue investigating about what happened while an independent investigation is ongoing

D.5. Sharing of nudes and semi-nudes ('sexting')

Sexting is the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery. This also includes images generated through the use of Artificial Intelligence.

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
- Whether there is an immediate risk to a child (Children)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children involved which would influence risk assessment/ safety planning
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a child has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13 years old
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the child is presenting as suicidal or self-harming)

If none of the above applies then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks and they will hold interviews with the children involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the school's local arrangements.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents including writing a clear rationale for all decisions made.

Curriculum coverage

As part of a broad and balanced curriculum children are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education [primary]/relationships and sex education [secondary] curriculums. This includes a more personalised or contextualised approach for vulnerable learners, including SEND children. The DSL works alongside the curriculum leader for PHSE to regularly review the curriculum and to consider contextual safeguarding issues within it.

D.6. Domestic abuse

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

D.7. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The DSL [and deputy/deputies] will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

D.8. So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

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

D.9. FGM
The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
Indicators that FGM has already occurred include:
- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs
- Potential signs that a pupil may be at risk of FGM include:
  - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
  - FGM being known to be practised in the girl's community or country of origin
  - A parent or family member expressing concern that FGM may be carried out
  - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
  - A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- ▪ Being unexpectedly absent from school
- ▪ Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- The above indicators and risk factors are not intended to be exhaustive.

D.10. Marriage

Marriages both unofficial (non-binding) as well as 'official' marriages before a child's 18th birthday are ~~now~~ a crime. On becoming aware of a marriage before a child's 18th birthday, even if there have been no threats, violence or coercion used, The DSL will:

- Speak to the child about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Contact the police.
- Refer the child to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

D.11. Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training, write a Prevent Risk Assessment for the school and make sure that staff have access to appropriate training to equip them to identify children at risk.

The risk of children in our schools being drawn into terrorism will be assessed. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in a child's behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
If staff are concerned about a child, they will follow the procedures set out in this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

D.12. Sexual violence and sexual harassment between children in schools
Sexual violence and sexual harassment can occur:
- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school

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

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

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

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

The DSL will record all incidents of sexual violence and harassment child on child on the online Child Protection system as well as within a separate document.

D.13 Serious violence

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

Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

D.14. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

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

Visitors are expected to sign the visitors' book and wear the correct coloured Lanyard to show if they are DBS checked. Those visitors without DBS check must be accompanied at all times by a member of school staff.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists or social workers, will be asked to show photo ID and will be asked to show their DBS certificate, which will be checked alongside their photo ID; or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Emotional abuse may involve:
- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Online misinformation, disinformation, fake news generated by AI/ social media.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
Once a child is born, neglect may involve a parent or carer failing to:
- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs
- **Where a child is alleged to have perpetrated abuse, the school may signpost to support such as 'Shore Space' (Lucy Faithfull Foundation) for confidential advice."**

Appendix 2: allegations of abuse made against staff/low-level concerns

Section 1: allegations that may meet the harms threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- If there is any doubt as to whether a concern meets the harm threshold, the local authority designated officer (LADO) will be contacted.

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others if they:

- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to relate directly to a child but could, for example, include an arrest for the possession of a weapon.
- Have, as a parent or carer, become subject to child protection procedures.
- Are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child or children for whom the adult is responsible in their employment/volunteering.

KCSIE states that, as part of a whole school approach to safeguarding, schools should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

Any allegation of abuse will be dealt according to the SJH Disciplinary Policy.

The parents or carers of the child/children involved about the allegation will be informed as soon as possible (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. The parents or carers of the child/children involved will be kept informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).

A referral will be made to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

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

Section 2: concerns that do not meet the harm threshold/low level concerns

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

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

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

Definition of low-level concerns
The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

The term 'low-level concern' does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'.

Sharing low-level concerns
We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.
We will create this culture by:
- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer if, for example, if they know are going to be in a situation which would be deemed a breach of the staff code of conduct (for example, a staff member has a child who is a pupil in the school and they have the mobile number of their child's friend) or if they find themselves in a situation which could be misinterpreted, or might appear compromising to others.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Ensuring our ongoing culture of vigilance maintains a mindset that 'it could happen here'.

Responding to low-level concerns
If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously to the individual involved and any witnesses.

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with Staff Code of Conduct. The Headteacher will seek advice from the school DSL, and the Director of Education as appropriate.

Record keeping
The Headteacher will ensure that all low-level concerns will be recorded in writing and held on a secure file or on Staffsafe. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
Records will be:
- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold this will be referred to the designated officer at the local authority.
- Retained in accordance with the SJH Data Retention Procedures.
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References
Low-level concerns will not be included in references unless:
- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Handbook.

This policy is also based on the following legislation:
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race)
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- Requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- Guidance for Gender questioning Children (Draft December 2023)
- Guidance for Preventing Radicalisation (Draft awaiting final publication July 2024)
- Statutory guidance RSHE (Guidance published and to be in place by September 2026)
- Guidance and advice for educational settings working with children in response to dealing with an incident of sharing nudes and semi- nudes March 2024 UKCIS
- Social care national framework DFE December 2023
- Information sharing advice for practitioners providing safeguarding services for Children, young people, parents and carers DFE May 2024
- CSA Centre for Expertise on Child Sexual Abuse: https://www.csacentre.org.uk/
- The Children's Society – Child Sexual Exploitation Resources: https://www.childrenssociety.org.uk/what-we-do/our-work/child-sexual-exploitation
- Early Years Foundation stage statutory framework September 2025 2025https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

The College will engage with any locally agreed multi-agency procedures put in place by the three school safeguarding partners as identified in Keeping Children Safe in Education.

The College will cooperate with any statutory safeguarding assessments conducted by children's social care. This includes ensuring representation at appropriate inter agency meetings such as children in need, child protection meetings, strategy meetings, local hub MASH meetings and core group meetings.

The College will actively engage with local safeguarding partnerships and participate in relevant multi-agency forums and training.