



# Safeguarding Children and Child Protection Policy

A statutory policy

Effective date 15<sup>th</sup> October 2025

Signed, Head Teacher Gary Price

Signed, Chair of Governors David Savage

Date approved by Governing Body 14<sup>th</sup> October 2025

Date of next review 30<sup>th</sup> September 2026

# 1. Horsley School Designated Members of Staff for Safeguarding

The designated persons should be used as the first point of contact for concerns and queries relating to any safeguarding concern in our school.

Designated Safeguarding Lead (DSL)	Peter Feldon (Co-Head of School), Jo Everett (Co-Head of School)
Designated Deputy Safeguarding Lead (DDSL)	Gary Price (Executive Head)
Safeguarding Governor	Catherine Beard
Designated Teacher for Children in Care (CiC)	Jo Everett
Designated Teacher for Pupil Premium (PP)	Jo Everett
Single Central Record	Peter Feldon

## **Designated Members of Staff for Safer Recruitment**

Safer Recruitment Staff: Gary Price, Peter Feldon and Jo Everett

Safer Recruitment Governors: Gary Price, David Savage

## **Local safeguarding procedures**

The DSL should make use of the information and support available through the Gloucestershire Safeguarding Children Partnership (GSCP) [Gloucestershire Safeguarding Children Partnership](#)

Where concerns are urgent, contact The Front Door, Gloucestershire MASH on 01452 426565 (option 1)

Professionals can also contact the social work triage desk on 01452 426565 (option 3) for advice and to discuss their concerns with a qualified social worker

For information on the Allegations Management process, see Appendix 3 and <https://www.gloucestershire.gov.uk/gscp/>

For the Child Protection Process Flow chart, see section 7.3 of this policy

The following link to the gov.uk webpage is also available for reporting child abuse to your local council:

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

## **National guidance and help**

You can also seek advice at any time from the NSPCC helpline on 0800 800 5000.

Crimestoppers telephone number is 0800 555 111.

The Channel helpline, which school staff and governors can call to raise concerns about extremism with respect to a pupil is 020 7340 7264.

You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Department for Education guidance on <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

## **1. Aims**

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare

- All staff and governors are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

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

We comply with this guidance and the arrangements agreed and published by Gloucestershire Safeguarding Children’s Partnership (on behalf of our three local safeguarding partners – see section 4) at <https://www.gloucestershire.gov.uk/gscp/>

This policy is also based on the following legislation and guidance:

- Section 175 of the Act places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment) 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, 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 regard 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 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 the Childcare Act 2006, which set out who is disqualified from working with children
- Department for Education Guidance on Mental Health and Behaviour in Schools – November 2018
- Working Together to Improve School Attendance – August 2024

## 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment
- Preventing impairment of children’s health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- Taking action to enable all children to have the best outcomes

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

**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.

**Sexting** (also known as youth-produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

**Children** include everyone under the age of 18.

**Misinformation** – False or incorrect information that is shared **without the intention to mislead**. This could be a mistake, misunderstanding or inaccuracy.

**Disinformation** – False information that is **deliberately created or spread in order to deceive or mislead** others, often to influence opinions or behaviour.

**Conspiracy theories** – Claims or beliefs that events are secretly controlled or manipulated by hidden, powerful groups or individuals, usually suggesting harmful or dishonest motives.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They 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)
- The integrated care board for an area within the LA
- The chief officer of police for a police area in the LA area

Gloucestershire's Safeguarding Children Partnership arrangements are referred to in Working Together – Gloucestershire's Multiagency Arrangements to Safeguard Children.

## 4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language.
- 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 looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Are LGBT+, gender questioning or perceived to be

## 5. Roles and responsibilities

Safeguarding and child protection are **everyone's** responsibility. This policy applies to all school staff, volunteers, and governors and is consistent with the procedures of the local safeguarding children's board. Our policy and procedures also apply to extended school and off-site activities.

### 5.1 All staff

All staff will read and understand part 1, Annex B, and Part 5 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (2025), and review it at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy safeguarding lead (DDSL), the behaviour policy, and the safeguarding response to children who go missing from education/ **children who are absent from education** for prolonged periods and/or repeated occasions – refer to <https://www.gloucestershire.gov.uk/schoolsnet/your-pupils/children-missing-education/>
- The early help process (sometimes known as the common assessment framework) and its role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authorities for children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child exploitation – sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, and radicalisation.
- A copy of the Child Protection Process chart is on the noticeboard in the staff room. Please refer to the flowchart in section 7.3 of this policy.

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

### 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Gary Price (Headteacher). The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the deputy DDSLs – Peter Feldon (Acting Deputy Headteacher, Deputy

DSL) or Jo Everett (Acting Deputy Headteacher, Deputy DSL) – will act as cover. In the absence of the DSL or DDSL, the DSL at Avening and Leighterton Primary – Jane Rushton (Headteacher, DSL) can be contacted. [head@avening.gloucs.sch.uk](mailto:head@avening.gloucs.sch.uk).

Contact out of school hours, if necessary, email [head@horsley.gloucs.sch.uk](mailto:head@horsley.gloucs.sch.uk).

The DSL or DDSL is the point of contact for out-of-term activities which run on school premises. However, if the concern is of a serious nature, contact The Front Door, Gloucestershire MASH on 01452 426565 (option 1)

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

### **5.3 The governing body**

The governing body will:

- Approve this policy at each review annually, ensuring it complies with the law and hold the headteacher to account for its implementation.
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- All governors undergo an Enhanced DBS check, and as they may be involved in regulated activity, this includes a children barred list check and a section 128 check.
- All governors complete annual self-declaration eligibility checks.
- The governing board will appoint a Safeguarding/link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Understand the role of the DDSL/DSL, as defined by KCSiE, 2025 (Annexe C)
- Receive relevant safeguarding training as part of their induction and regular updates thereafter
- Read, annually, as a minimum, Part 1 and Annexe B of ‘Keeping Children Safe in Education’ and sign to say they have read and understand the document. Governors need to stay up-to-date with updates provided by the headteacher and/or clerk

The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate (see Appendix 3).

Section 15 below has information on how governors are supported in fulfilling their role.

### **5.4 The headteacher**

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems, which support safeguarding, including this policy, as part of their induction.

- Ensuring that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents when their child joins the school, and via the school website.
- Ensure that the DSL has appropriate time, funding, training, and resources, and that there is always adequate coverage if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Checking the identity and suitability of visitors (see this section in Appendix 4) and making visitors to school aware of safeguarding matters, e.g. through a leaflet on arrival.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3).

### 5.5 The pupils

At school, it is essential that the children in our care understand how to keep themselves and others safe.

We do this by promoting our school ethos of a caring and safe environment. We use the principles in this policy to ensure children are valued and know who to speak to.

The school implements this by

- The PSHE, RSE and Computing curriculums, and learning environment
- Child's voice, e.g. circle time, class discussion, assemblies, School Council
- Working within the behaviour policy
- Working with multiple agencies
- Ensuring staff training and knowledge are up-to-date

## 6. Confidentiality

Confidential information and records will be held securely and will only be available to those who have a right or professional need to see them.

With regard to sharing information, the school is aware that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of promoting welfare and protecting the safety of children.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.
- 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.
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information and will support staff who must make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

Confidentiality and information sharing are also addressed in section 14 of this policy regarding record-keeping and sharing information and allegations of abuse against staff in appendix 3.

## 7. Recognising abuse and taking action

Staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

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 (see section 5.2) as soon as possible if you make a direct referral.

Follow the [school procedure below \(section 7.2\) to write it up.](#)

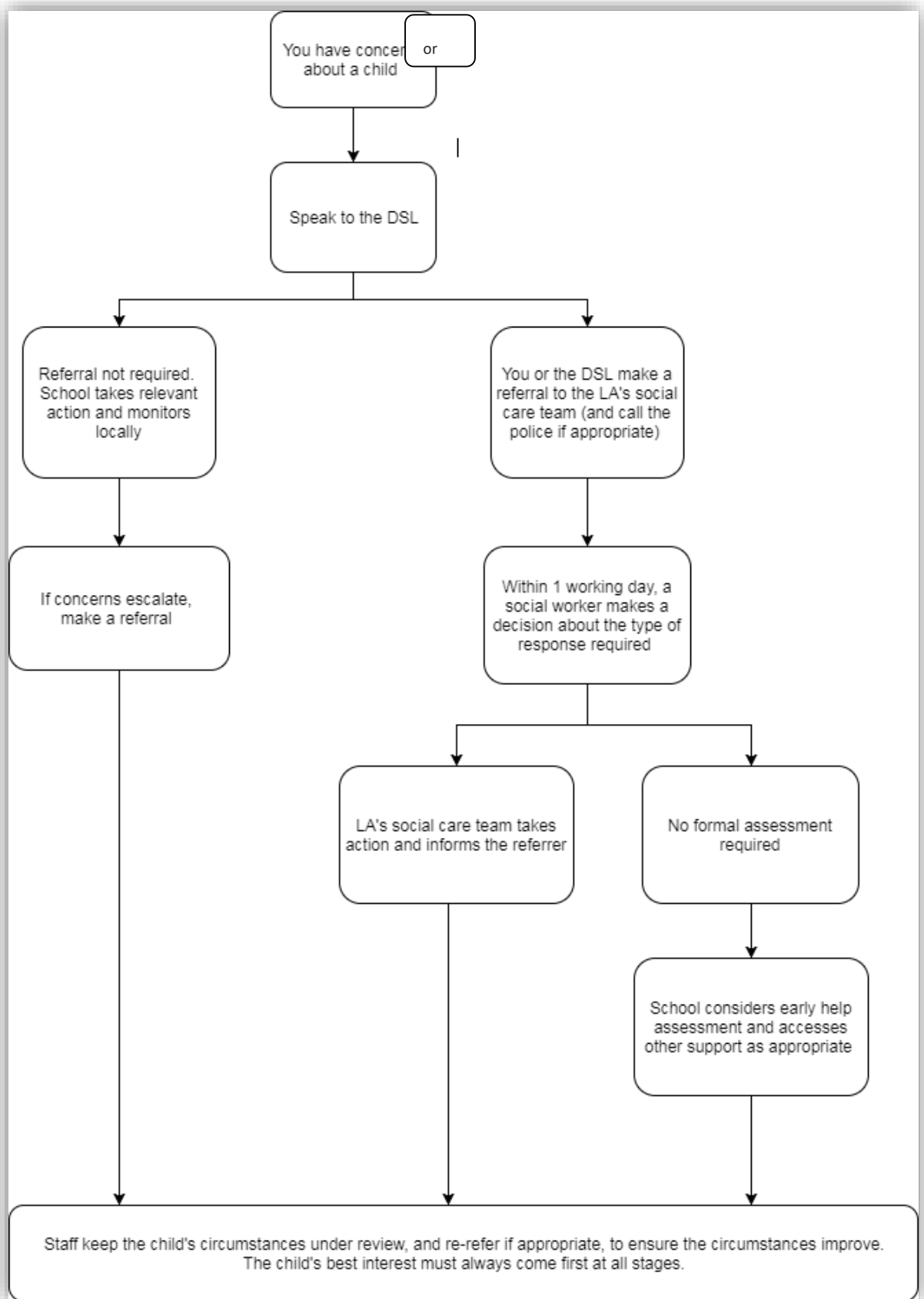
### 7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely, and do not ask leading questions. Use TED language, as appropriate (i.e., ‘Tell me about... ‘Explain’, ‘Describe...’).
- 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.
- Where relevant, explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- **School procedure:** Write up your conversation using CPOMS as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgment on it.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- The DSL will then take appropriate action and record using CPOMS.
- Be mindful that they may not be able to talk about the abuse they may have experienced.
- Ensure the DSL and/or DDSL takes appropriate action (Safeguarding is everybody’s responsibility).
- The DSL should keep staff members updated on the appropriate action being taken.

### 7.3 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)

The flowchart below shows the procedure to follow if you have any concerns about a child’s welfare.



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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the DDSL or safeguarding governor, 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.

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

### School procedure

All safeguarding concerns and disclosures are logged using the online safeguarding portal, CPOMS (Child Protection Monitoring and Safeguarding System). <https://www.cpoms.co.uk/>

Safeguarding concerns and disclosures are stored electronically and securely.

All staff are trained to know when and how to report a concern using CPOMS. Newly appointed staff receive CPOMS training as part of induction.

When a member of staff records a safeguarding concern, the DSL and/or DDSL (nominated by the inputter) receive an email alert. This prompts the DSL or DDSL to review the information and take appropriate action.

Only the DSL and DDSL have full access to safeguarding information stored on CPOMS.

Safeguarding is a regular agenda item at staff and governor meetings.

### Referral

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

If you make a referral directly (see section 7.1), 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.

### Early help

All children receive Universal Services; however, some children will need extra support in order to be healthy, safe and to achieve their potential.

Gloucestershire Family Information Service is a universal service (FIS) that provides impartial information on childcare, finances, parenting, and education. FIS are a useful source of information for parents and professionals. They support families, children, and young people aged 0-19 years (25 for young people with additional needs), as well as professionals working with these families. Please refer to the FIS at <https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/family-information-service-fis/> or email [familyinfo@gloucestershire.gov.uk](mailto:familyinfo@gloucestershire.gov.uk), or telephone 0800 542 02 02 or 01452 427362.

We want all our children and young people, including those with Special Educational Needs and Disabilities (SEND), to achieve the best possible outcomes and receive the support they need when they need it most. In Gloucestershire, there is one integrated, holistic Graduated Pathway of Early Help and Support. This pathway will enable practitioners to work with children, young people, and their families, ensuring they receive the right support when they need it most.

The purpose of early help is to prevent issues and problems becoming serious and harmful to the child, young person, family, and community. When children and families need this extra support, they need it quickly. Provision of early help support can be at all stages of a child's life; pre-birth, during pregnancy, childhood, or adolescence.

Please refer to the Local Authority Offer of Early Help. Early Help information is available following this link: [Early Help and Targeted Support | Gloucestershire County Council](#)

**All staff must be aware of the offer of Early Help.** At all times, all staff should consider if there is any offer of early help that we can make to help a child thrive.

The GSCP's continuum of need' windscreen is an important diagram to keep in mind for all children.

The DSL will keep the case under review and will consider a referral to local authority children's social care if the situation does not improve.

Please refer to the Escalation Procedure at Gloucestershire's Safeguarding Children Partnership <https://www.gloucestershire.gov.uk/gscp/>

The school's Early Help offer is available on the website. <http://www.horsley.gloucs.sch.uk/early-help.html>

#### **7.4 If you discover that FGM has taken place or a pupil is at risk of FGM**

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

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

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

**Any teacher** who either:

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

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

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

We will follow the procedures set out by Gloucestershire's Safeguarding Children Partnership <https://www.gloucestershire.gov.uk/gscp/>

#### **7.5 If you have concerns about extremism**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

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

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

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

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

## 7.6 If you have a mental health concern

In line with KCSiE 2025, the mental well-being of children is considered highly important. A range of approaches are adopted to promote the well-being of children. These include, but not exclusively:

- An engaging and motivating curriculum (the Horsley Curriculum);
- An online Personal, Social and Health Education (PSHE) Curriculum which develops and awareness and understanding of well-being issues  
<https://www.coramlifeeducation.org.uk/scarf/>;
- A range of after-school clubs, including sports and yoga activities, peripatetic music tuition, and opportunities to partake in concerts, events and residential;
- The employment of a qualified sports coach to support staff with the teaching of physical education;
- The employment of qualified Emotional Support Assistant (ELSA) to provide bespoke emotional support for pupils with well-being needs;
- and the support of external agencies, e.g., MASH, GCC Early Help, as required.

The importance of pupil well-being is also reflected in other key policies, such as the Behaviour Policy, the Anti-Bullying Policy, and the Relationships, Sex and Health (RSHE/RSE) Policy. Pupil well-being is regularly monitored (e.g., via surveys) and findings reported to governors.

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. Mental health problems can be a sign of short or long-term domestic abuse.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.3.

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

The school will make reference to the Department for Education guidance on mental health and behaviour in schools for more information.

## **7.7 Concerns about a staff member or volunteer**

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

If you feel you have a low-level safeguarding concern about a member of staff, this should be reported to the headteacher; in the case of the concern being related to the headteacher, this should be reported to the chair of governors.

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

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

## **7.8 Allegations of abuse made against other pupils (child-on-child abuse)**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. From 2022, the term child-on child abuse has been used to recognise that children of different ages may abuse others.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously. Pupils who are LGBT+, gender questioning, or perceived to be, may be particularly susceptible to child-on-child abuse. Staff are mindful of this.

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

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

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

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

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

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

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

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

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting, or sending sexual images
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know who they can talk to and are able to report abuse using our reporting systems easily and confidently (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity, and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

## 7.9 Sexting

This approach is based on guidance from the UK Council for Child Internet Safety

### **Responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL

- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery 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 from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents 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 young person 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 imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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

### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

### **Informing parents**

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

### **Referring to the police**

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

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements of this policy also apply to recording incidents of sexting.

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our Y6 PSHE education and computing programmes. Teaching covers the following in relation to sexting:

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

Pupils also learn the strategies and skills needed to manage:

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

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **7.10 Reporting systems for our pupils**

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils e.g. through discussion in relationship/sex education curriculum
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Help pupils to feel safe in submitting any concerns, e.g. reassurances provided following disclosures.

## **8. Online safety and the use of mobile technology**

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

To address this, our school aims to:

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

Children are taught about staying safe online. This is undertaken through the PSHE/RSHE Curriculum. At Horsley we use the SCARF Curriculum. <https://www.coramlifeeducation.org.uk/>. In addition, pupils experience internet safety training via themed assemblies, events such as Internet Safety Week and through the Computing Curriculum.

#### **The 4 key categories of risk**

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

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, 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

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
  - Train staff, as part of their induction, on safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example, that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all staff aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Leaders carry out an S175/157 audit, including online safety, that considers and reflects the risks faced by our school community

This section is a summary, but for comprehensive details about our school's policy on online safety please refer to our online safety policy which you can find on our website.

## **9. Notifying parents or carers**

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **10. Pupils with special educational needs and disabilities & Inclusion**

We recognise that pupils with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges. 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 disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Children with SEND may be added to the Vulnerability Register. The vulnerability register is maintained by the Headteacher/SENCO. Children identified are monitored by staff. This is reviewed regularly.

We offer extra pastoral support for pupils with SEN and disabilities, please refer to the SEND policy.

## **11. Pupils with a social worker**

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

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

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

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

## **12. Looked-after and previously looked-after children**

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

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

We have appointed a designated teacher, Jo Everett (Co-Head of School), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

## **13. Complaints and concerns about school safeguarding policies**

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

### **13.2 Other complaints**

Any other complaints will follow the school's complaints policy and procedure. This may involve referring to the Local Authority (GCC).

### **13.3 Whistle-blowing**

Please refer to the school's separate whistle-blowing policy that includes concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

## 14. Record-keeping

We will hold records in line with our records retention schedule – see the school’s Data Protection Policy.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded using CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL.

Confidential information and records will be held securely using CPOMS and only available to those who have a right or professional need to see them.

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 promptly and securely, and separately from the main pupil file in line with KCSiE 2025, i.e. five working days. This would normally be sent electronically via the online system, egress. Where schools are using CPOMS, or a similar system, information may be sent as a data transfer via CPOMS. 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 should ensure secure transit and confirmation of receipt should be obtained.

If the school/setting is unclear where a pupil is moving, the Headteacher should follow the GCC Missing Children Protocol. Equally school/setting should also check the Missing Children database for pupils arriving with no records from previous schools/settings or where the previous school/setting is not known.

As a child with a previous incident or on a Child Protection Plan moves through the school, the DSL should make the relevant teaching staff aware so that good vigilance can be maintained.

The DSL should monitor attendance patterns and seek advice from the Local Authority where appropriate.

Child Protection records should be treated as a special category of personal data and must comply with the Data Protection Act 2018 and GDPR. For more details, see the confidentiality policy and data handling policy.

Records held from 2021 are held electronically using CPOMS.

### Sharing information

The governing body will ensure that relevant staff have due regard to the data protection principles, which allows them to share personal information as provided for in the Data Protection Act 2018, and the GDPR.

Relevant staff should be confident of the processing conditions under this legislation which allow them to store and share information for safeguarding purposes as ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share information.

This includes allowing 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.

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.

In addition:

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

## **15. Training**

### **15.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to 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 in line with advice from the 3 safeguarding partners.

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

All staff will have training on Female Genital Mutilation (FGM).

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) 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, if applicable. All new volunteers will be required to read the Child Protection Policy.

### **15.2 The DSL and DDSL**

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

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

They will also undertake Prevent awareness training, Channel training and FGM training.

### **15.3 Governors**

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

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose, and will refer to and follow GSCP procedures.

### **15.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See Appendix 2 for Safer recruiting procedures followed.

## **16. Site Security**

We recognise our duties as a primary school to maintain site security to keep children safe within the school site, church and in their journeys to and from school. We recognise that in addition our site does contain a number of potential hazards because of e.g.

- the main road
- distance of playground from school

- distance of church (school hall) from school
- maintenance

## 17. Monitoring arrangements (incl. monitoring internet use)

The Southwest Grid for Learning (SWGfL) provides a robust system for filtering potentially inappropriate and potentially harmful content.

Children are taught about the dangers of online safety through their computing curriculum (Purple Mash) and through Personal, Social and Health Education (Scarf Curriculum). Children are encouraged to report, immediately to a teacher if they access inappropriate content online, or if they discover online activity of concern (e.g. access to chatroom activity). When reported, the DSL or DDSL will take immediate measures to block such sites. This is undertaken with the support of the school's IT Technician.

The DSL and DDSL are responsible for regularly monitoring the internet activity of children and staff in school and the use of school devices out of school. The school's IT technical monitors internet activity regularly, including the use of school iPads. Concerns are raised with the DSL and DDSL.

## 18. Organisations or individuals using the school premises

The school is occasionally used by outside agencies out of school time. Should the school receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, the school's safeguarding policy and procedures will be adopted and the local authority designated officer (LADO) will be contacted. If the incident pertains to the use of the church, St. Martin's Church of England safeguarding policy and procedures will be followed, unless the matter relates to use of the church during school hours, or between the school's agreed hours of use.

When the school is used by outside agencies, out of school hours, the DSL and/or DDSL will be made known to the hirer or user so that the designated safeguarding lead can respond to any safeguarding concerns.

## 19. Links with other policies

This policy links to the following policies and procedures, available on our website [www.horsley.gloucs.sch.uk](http://www.horsley.gloucs.sch.uk):

Behaviour/Anti-bullying; Staff behaviour/code of conduct; Complaints; The offer of Early Help; Health and Safety; Attendance; Equality Objectives; Sex and relationships education; Relationships, Sex, Health and Education (RSHE); Data Protection Policy; Whistle-blowing; Online safety policy.

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

### Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

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

For signs of abuse, please refer to Keeping Children Safe in Education, 2025

## **Appendix 2: safer recruitment and DBS checks – policy and procedures**

### **Recruitment and selection process**

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

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

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken

- That an online search of short-listed candidates will be conducted as part of due diligence checks
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

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

CVs will not be accepted in lieu of an application form. CVs will also not be accepted alongside a completed application form.

### **Shortlisting**

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

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

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

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Information that has arisen from the online checks
- Sign a declaration confirming the information they have provided is true

In line with KCSiE 2025, online searches for selected candidates will be conducted to identify any possible safeguarding concerns which might be deemed appropriate to explore at the interview stage.

### **Seeking references and checking employment history**

We will obtain references before interview where possible. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

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

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Ask targeted questions related to safeguarding procedures and practice
- Question, where relevant, concerns that may arise from the online checks that were conducted prior to interview
- Record all information considered and decisions made

### **Re-appointment vetting checks**

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

### **New staff**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). The DBS will not be retained on file, but the relevant details will be recorded onto the SCR in line with KCSiE (2025).
- Obtain a separate barred list check if they will start work in a regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher. This also applies to staff employed in "teaching work" (KCSiE, 2025). This can include, for example, a Teaching Assistant who has Qualified Teacher Status (QTS).
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

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

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

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

## **Contractors**

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

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

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

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

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

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

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

## **Trainee/student teachers**

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

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

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

## **Volunteers**

We will:

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

## **Governors**

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

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

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

**Staff working in alternative provision settings**

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

**Adults who supervise pupils on work experience**

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

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

**Pupils staying with host families**

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

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

## Appendix 3: Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

### Suspension

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

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

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

### Definitions for outcomes of allegation investigations

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

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including

whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. This would include advice to the individual facing the allegation to turn to a trade union representative, or a colleague for support, and could also include a referral for welfare counselling or medical advice.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

## **Timescales**

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

## **Specific actions**

### **Action following a criminal investigation or prosecution**

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

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

### **Confidentiality**

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

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

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

### **Record-keeping**

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

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

This will include consideration of (as applicable):

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

### **Non-recent allegations**

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

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

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

### **Section 2: concerns that do not meet the harm threshold**

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

Concerns may arise through, for example:

- Suspicion
- Complaint

- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

### **Definition of low-level concerns**

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

### **Responding to low-level concerns**

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy/code of conduct.

### **Record keeping**

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

### **References**

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

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

## Appendix 4: Specific safeguarding issues

**Children missing from education (CME)/ children who are absent from education** for prolonged periods and/or repeated occasions

<https://www.gloucestershire.gov.uk/schoolsnet/your-pupils/children-missing-education/>

A child going 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.

There are many circumstances where a child may become absent from education for prolonged periods and/or repeated occasions, but some children are particularly at risk. These include children who:

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

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

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

### **Child exploitation**

#### **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.

**Child sexual exploitation (CSE)** is a form of child sexual abuse that occurs 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 victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

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.

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.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education
- Children being exploited by gangs involved in drug crime. County Lines gangs use children and vulnerable people to courier drugs and money. Find out more at <https://www.childrensociety.org.uk/what-is-county-lines> or phone Crimestoppers on 0800 555 111

### **Domestic abuse**

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

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

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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. This is the procedure where police forces are part of Operation Encompass.

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

### **Homelessness**

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

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

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

### **So-called 'honour-based' violence (including FGM and forced marriage)**

So-called 'honour-based' violence (HBV) 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 HBV 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 HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

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

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

Indicators that FGM has already occurred include:

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

- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

### **Forced marriage**

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. 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.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the behaviour policy and ICT acceptable use policy.

### **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 and online.

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 peers
- 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 nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

### **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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual transgender (LGBT) or 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 section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

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

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

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

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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

### **Checking the identity and suitability of visitors**

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

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

Visitors are expected to sign in using the online system and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

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

### **Non-collection of children**

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

- Make a phone call to home after 10 minutes. Try again after 10 minutes.
- If still no response work through all emergency contacts listed for the child.
- If not successful and the child is still uncollected then the school will contact social services.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

At any point in the school day if it is apparent that a child has gone missing, we will clarify when the child was last seen. If a concern remains:

- Ensure all other children are adequately supervised
- Send two members of staff with a mobile phone to search the school and surrounding areas thoroughly
- If the child remains missing after 20 minutes contact a parent or carer
- Continue with the search having had a dialogue with parent or carer and if after 30 minutes the child is still missing, notify the police
- Continue searching and working with the police and parent or carer to find the child

### **Appendices**

- MyPlan Template
- EAL Plan Template
- Attendance Plan Template
- Behaviour Plan Template
- Individual Risk Assessment

# MYPLAN

MyPlan Guidance Notes

Child/Young Person's Name:	Date of Birth:	Parent/Carer/Young Person's Signature:	MyPlan No:
Parent/Carer's Name:	Parent/Carer consent to attach an electronic copy of this plan to child/young person's details held by Gloucestershire County Council: YES/NO		Parent/Carer/Young person consent to share this MyPlan: YES/NO
People Contributing to MyPlan:			
<b>My Needs</b>	<b>My Outcomes</b>	<b>Actions</b>	<b>Resources</b>
Reason for MYPLAN: Please include brief information about the child/young person's strengths & difficulties and the impact on their life.			
What has already been tried to support the child/young person?			
Has a MY PROFILE (or something similar) been completed for all children/young people named in this plan? YES/NO			
Name of Lead Practitioner: TBC	Date of Completion: TBC	Date of Review: TBC	

# EAL PLAN

## EAL Plan Guidance Notes

Child/Young Person's Name:	Date of Birth:	Parent/Carer/Young Person's Signature:	EAL Plan No:
Parent/Carer's Name:	Parent/Carer consent to attach an electronic copy of this plan to child/young person's details held by Gloucestershire County Council: YES/NO		Parent/Carer/Young person consent to share this EAL Plan: YES/NO
People Contributing to EAL Plan:			
<b>My Needs</b>	<b>My Outcomes</b>	<b>Actions</b>	<b>Resources</b>
Reason for EAL Plan: Please include brief information about the child/young person's strengths & difficulties and the impact on their life.			
What has already been tried to support the child/young person?			
Name of Lead Practitioner: TBC	Date of Completion: TBC	Date of Review: TBC	

# ATTENDANCE PLAN

## Attendance Plan Guidance Notes

Child/Young Person's Name:	Date of Birth:	Parent/Carer/Young Person's Signature:	Attendance Plan No:
Parent/Carer's Name:	Parent/Carer consent to attach an electronic copy of this plan to child/young person's details held by Gloucestershire County Council: YES/NO		Parent/Carer/Young person consent to share this Attendance Plan: YES/NO
My Needs	My Outcomes	Actions	Resources
Reason for Attendance Plan: Please include brief information about the child/young person's strengths & difficulties and the impact on their life.			
What has already been tried to support the child/young person?			
Name of Lead Practitioner: TBC	Date of Completion: TBC	Date of Review: TBC	

# BEHAVIOUR PLAN

## Behaviour Plan Guidance Notes

Child/Young Person's Name:	Date of Birth:	Parent/Carer/Young Person's Signature:	Behaviour Plan No:
Parent/Carer's Name:	Parent/Carer consent to attach an electronic copy of this plan to child/young person's details held by Gloucestershire County Council: YES/NO		Parent/Carer/Young person consent to share this Behaviour Plan: YES/NO
People Contributing to Behaviour Plan:			
<b>My Needs</b>	<b>My Outcomes</b>	<b>Actions</b>	<b>Resources</b>
Reason for Behaviour Plan: Please include brief information about the child/young person's strengths & difficulties and the impact on their life.			
What has already been tried to support the child/young person?			
Name of Lead Practitioner: TBC	Date of Completion: TBC	Date of Review: TBC	

**Risk Assessment Form**

<b>Workplace / Location:</b>	
<b>Activity Description:</b>	
<b>Assessment date:</b>	
<b>Review date:</b>	
<b>Names of Assessors:</b>	

L= Likelihood  
 S = Severity  
 R = Risk (L X S)

Current Tasks										
Hazard & Description	Who & No. of people involved	Control Measures	Risk (with controls)			Are Additional Controls Required?	Residual Risk (after additional controls)			Action Plan (Officer responsible & target date)
			L	S	R		L	S	R	
Description										

Consequence/Severity	Likelihood				
	1	2	3	4	5
	Rare	Unlikely	Possible	Likely	Almost Certain
5 Catastrophic	5	10	15	20	25
4 Major	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Minor	2	4	6	8	10
1 Negligible	1	2	3	4	5

	1 – 3	Low risk
	4 – 6	Moderate risk
	8 – 12	High Risk
	15 - 25	Extreme risk