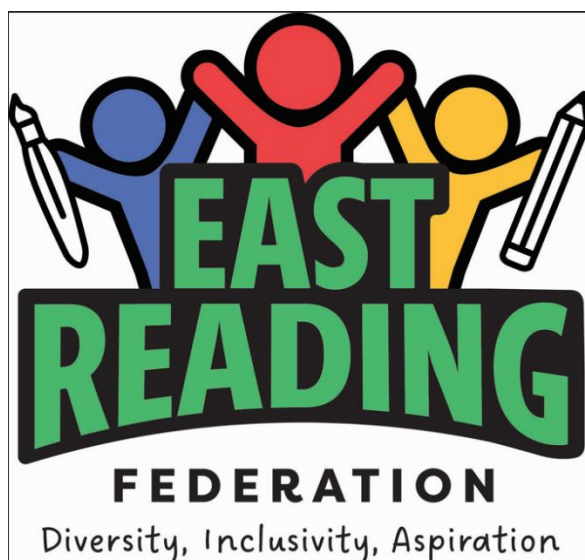




Safeguarding & Child Protection Policy 2026

POLICY OWNER

Laura Kerr/Christian Lim
Headteachers

DELEGATION

Full Governing Board

DATE OF APPROVAL

September 2026

DATE OF NEXT REVIEW

September 2027

REVIEW CYCLE

Annual

PUBLISHED ON WEBSITE

Yes

Paper copies available by
emailing

asps-admin@eastreadingfederation.co.uk

RL:-

admin@eastreadingfederation.co.uk.reading.sch.uk

Alfred Sutton Primary School
148 Wokingham Road
Reading
RG6 7BL
DFE No: 870/2000
www.alfredsutton.primary.co.uk

Redlands Primary School
Lydford Road
Reading
RG1 5QH
DFE No: 870/2018
www.redlandsschool.co.uk

Approved by:	Full Governing Board	Date: 29th September 2026
---------------------	-----------------------------	---

Last reviewed on:	29th September 2026
--------------------------	----------------------------

Next review due by:	1st September 2027
----------------------------	---------------------------

Contents:

1. Statement of Intent
2. Definitions
3. Legal framework
4. Roles and responsibilities
5. Inter-agency working
6. Abuse, neglect and exploitation
7. Types of abuse and neglect
8. Honour based abuse/Forced Marriage
9. Domestic Abuse
10. Child sexual exploitation (CSE), Child Criminal Exploitation (CCE)
11. Homelessness
12. County lines criminal activity
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Contextual safeguarding
16. Preventing radicalisation
17. Upskirting
18. Serious Crime/Violence
19. Children Absent from Education and Attendance
20. Pupils with SEND
21. Young Carers
22. Children with Medical Conditions
23. Mental health
24. Elective Home Education
25. Alternative provision
26. Work experience
27. Homestay exchange visits
28. Private fostering
29. Child trafficking and modern slavery
30. Concerns about a pupil
31. Children potentially at greater risk of harm
32. Children requiring mental health support
33. Early help
34. Managing referrals
35. Allegations against staff (including low level concerns)
36. Dealing with allegations of abuse against staff
37. Child On Child Abuse, Harassment and Violence
38. Allegations of abuse against other pupils
39. Communication and confidentiality
40. Online safety/Cybercrime/Filtering & Monitoring Systems

- 41. Information sharing
- 42. Safer recruitment
- 43. Single central record (SCR)
- 44. Staff suitability
- 45. Training
- 46. Monitoring and review
- 47. Useful telephone numbers
- 48. Useful links

Appendix

Appendix 1 – Staff Disqualification Declaration

Appendix 2 – Safeguarding Reporting Process

Appendix 3 – Contacts & Advice

1. Statement of Intent

At the Federation we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

Staff will share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. This will not prevent staff from having a professional curiosity and speak to the DSL/DDSL's.

The Federation recognises that safeguarding concerns rarely occur in isolation and that children may experience multiple and overlapping forms of abuse, neglect, exploitation and vulnerability. The Federation adopts a whole-school safeguarding culture that prioritises prevention, early identification, Family Help, information sharing and multi-agency working. Staff understand that safeguarding includes both online and offline risks, including those associated with artificial intelligence, misinformation, disinformation, serious violence, child criminal exploitation, child-on-child abuse and mental health concerns.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to abuse.
- Ensure that members of the governing board, the Headteachers and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns

- to the Designated Safeguarding Lead (DSL).
- Ensuring that the Headteacher and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The Designated Safeguarding Lead (DSL) for Alfred Sutton Primary School is June Mills – Family Support Officer

Deputy Safeguarding Leads (DDSL's) for Alfred Sutton Primary School are Laura Kerr Head teacher, Sarah Osborne, Inclusion Lead, Richard Watson, and Victoria Maskell, Deputy Headteachers

The Governors with responsibility for Child Protection are David Dymond and Katherine Fowler

The Designated Teacher for Looked After and Previously Looked After is Sarah Osborne – Inclusion Lead

The Local Authority Designated Officer (LADO) contact number is 01189 372684 – email: lado@reading.gov.uk

The Designated Safeguarding Lead (DSL) for Redlands Primary School is Christian Lim – Headteacher

Deputy Safeguarding Leads (DDSL's) for Redlands Primary School are Colleen Whiteway, Inclusion Lead, Beth Wright, Richard Watson, and Victoria Maskell, Deputy Headteachers and June Mills, Family Support Officer

The Governors with responsibility for Child Protection are David Dymond and Katherine Fowler

The Designated Teacher for Looked After and Previously Looked After is Colleen Whiteway – Inclusion Lead

The Local Authority Designated Officer (LADO) contact number is 01189 372684 – email: lado@reading.gov.uk

2. Definitions

The terms “children” and “child” refer to anyone under the age of 18.

Safeguarding and promoting the welfare of children means:

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

Safeguarding concerns frequently overlap and may involve abuse, neglect, exploitation, serious violence, mental ill-health, online harm, domestic abuse and child-on-child abuse occurring simultaneously.

Child-on-parent/carer abuse, financial exploitation and modern slavery are recognised safeguarding concerns and should be considered as part of assessment and intervention planning.

For the purposes of this policy, the term “harmful sexual behaviour” includes, but is not limited to the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DfE’s guidance, ‘sexual violence and sexual harassment between children in schools and colleges (2017), and for the purposes of this policy, the term “sexual harassment” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term “sexual violence” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

The term “teaching role” is defined as planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headteacher to provide such direction and supervision.

3. Legal framework

Working Together to Safeguard Children 2023 remains the key statutory safeguarding framework and references to Family Help and Families First reforms should be reflected throughout this policy.

This Policy has been created with due regard to all relevant legislation including, but not limited to, the following;

Legislation

- Children Act 2004
- Safeguarding Vulnerable Groups 2006
- The Education (School Teachers' Appraisal)(England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR) 2018
- The Childcare (Disqualification) Regulations 2018

Statutory Guidance

- HM Government (2023) Multi-agency practice guidelines: Handling cases of 'Forced Marriage'
- DfE (2024) Working together to Safeguarding Children
- DfE (2018) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information Sharing'
- DfE (2023) 'The Prevent Duty'
- DfE (2026) 'Keeping Children Safe in Education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2017) 'Child Sexual Exploitation'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'

Other relevant school policies include;

- Allegations of abuse against staff Policy
- Behaviour Policy
- Whistleblowing Policy
- Anti-bullying Policy
- Exclusion Policy
- Staff Code of Conduct

4. Roles and Responsibilities

The Governing Board has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children (2023)'.
- Confirm that the school's safeguarding arrangements take into account the

procedures and practices of the LA as part of the inter-agency safeguarding procedures.

- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff from the senior leadership team (SLT) to the role of DSL as an explicit part of the role-holder's job description
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description.
- Make sure that pupils are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBT.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place in order to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Guarantee that there are systems in place for pupils to express their views

and give feedback.

- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check
- Ensure all staff, including those not working directly with children, have read Part One of KCSIE 2026.
- Ensure filtering and monitoring systems are reviewed annually and records retained.
- Ensure robust DSL cover arrangements are in place and understood by staff.
- The Federation will ensure safeguarding expectations extend to any external organisations, clubs, community groups or individuals using school premises.
- Appropriate safeguarding arrangements, risk assessments and information-sharing processes must be in place.
- Concerns relating to individuals or organisations using school premises will be reported in accordance with child protection procedures and Local Authority guidance.

The Headteachers have a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession
- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide all staff with Part One of KCSIE 2026. Annex A has been removed and all staff are required to understand the same safeguarding expectations.

The DSL has a duty to:

- Refer all cases of suspected abuse to the **Children's Single Point of Access (CSPOA)**, the LA Designated Officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed.

- Refer cases of radicalisation to the Channel Programme.
- Liaise with the Headteacher to inform him/her of safeguarding issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate.
- Keep cases of early help under constant review and refer them to the CSPOA if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference, and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Be alert to the specific requirements of children in need, including those with SEND and young carers.
- Keep detailed, accurate and secure records of concerns and referrals.
- Secure access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
- Ensure that a pupil's child protection file is copied when transferring to a new school.
- Be available at all times during school hours to discuss any safeguarding concerns.
- Hold the details of the LA personal advisor and liaise with them as necessary.
- All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- Be familiar with Family Help pathways and local referral arrangements.
- Maintain robust arrangements for DSL availability and deputy cover.

- Ensure safeguarding records include concerns relating to serious violence, online harms, AI-generated abuse, misogyny, harmful sexual behaviour, child-on-parent abuse and financial exploitation.
- Monitor safeguarding implications arising from persistent absence as well as children missing education.
- **NB.** The school will determine what “available” means, e.g. it may be appropriate to be accessible by electronic means such as phone or Skype, Microsoft Teams, etc.

The designated teacher has a responsibility for:

- Promoting the educational achievement of CLA and previously CLA, and for children who have left care through adoption, special guardianship or child arrangement orders who are adopted from state care outside England and Wales.

Other staff members have a responsibility to:

- Safeguard pupils’ wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which pupils can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Maintain an attitude of ‘it could happen here’ where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to CSPOA, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Support social workers to take decisions about individual children, in collaboration with the DSL.
- If at any point there is a risk of immediate serious harm to a child, make a referral to CSPOA and/or the police immediately.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Follow the school’s procedures for, and approach to, preventing radicalisation as outlined in the Preventing Duty Policy (May 2025).
- and All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual

abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines radicalisation.

5. Inter-agency working

- The school contributes to inter-agency working as part of its statutory duty.
- The school will work with CSPOA, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.
- The school recognises the importance of information sharing between professionals and local agencies in order to effectively meet pupils' needs.
- In light of the above, staff members are aware that whilst the GDPR places a duty on schools to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.
- Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils
- The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE) and child criminal exploitation (CCE)

6. Abuse, neglect and exploitation

- All members of staff will be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will be overlap.
- All staff members will be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
- When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:
 - i. Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
 - ii. Lack of concentration and acting withdrawn
 - iii. Knowledge ahead of their age, e.g. sexual knowledge.
 - iv. Use of explicit language
 - v. Fear of abandonment
 - vi. Depression and low self-esteem
- All members of staff will be aware of the indicators of child-on-child abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.
- All staff will be aware of the necessary procedures to follow to prevent child-on-child abuse, as outlined in the school's Anti-Bullying Policy.

- All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put pupils in danger.
- Staff members will be aware of the effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home.

7. Types of abuse and neglect, and exploitation

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

Physical abuse: A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: A form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

Sexual abuse: A form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve penetrative assault, such as touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

Neglect: A form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

Child-On-Child Abuse: All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. All staff should be clear as to the school or policy and procedures with regard to child-on child abuse and the important role they have to play in preventing it responding where they believe a child may be at risk from it.

8. Honour Based Abuse/FGM/Forced Marriage

Honour based abuse, including Female Genital Mutilation and Forced Marriage. This is

the abuse committed in the context of preserving honour. It often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when a decision is made on what form of safeguarding action to take (DfE 2019a).

Female genital mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (for example, withdrawal or depression) on the girl's return reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure. Staff must personally report to the police cases where they discover FGM appears to have been carried out, and discuss any such cases with the

DSL and children's social care. The duty does not apply in relation to at risk or suspected cases.

Staff will not examine pupils, and so it is rare that they will see any visual evidence, but they will report to the DSL's who will report to the police where an act of FGM appears to have been carried out.

FGM is also included in the definition of 'honour based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

All forms of HBA are forms of abuse and will be treated and escalated as such.

Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will activate local safeguarding procedures if concerns arise.

Forced Marriage

For the purpose of this policy, a **"forced marriage"** is defined as a marriage that is 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 the marriage. There has been a change in the law from February 2023 around forced marriages and it is now a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or coercion are not used. This applies to non-binding, unofficial marriages, as well as legal marriages.

As part of HBA, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from school.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSPOA, the police or the Forced Marriage Unit.

9. Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;

- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

People who are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. (The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

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 sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

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

- They may become anxious or depressed.
- They may have difficulty sleeping, which will have an impact on their education.
- They have flashbacks or nightmares.
- They can be easily startled.
- They may complain of physical symptoms such as tummy aches and may start to wet the bed.
- They may have temper tantrums and problems with school.
- They may become aggressive or they may internalise their distress and withdraw from other people.
- They may have a lowered sense of self-worth.
- Older children may begin to play truant, start to use alcohol or drugs, begin to self-harm by taking overdoses or cutting themselves or have an eating disorder.

Children may also feel angry, insecure, alone, frightened, powerless or confused. They

may have ambivalent feelings towards both the abuser and the non-abusing parent.

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

Operation Encompass - Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website; <https://www.operationencompass.org/>.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

10. Child Sexual Exploitation (CSE)/Child Criminal Exploitation (CCE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include;

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks; • Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identify

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Some of the following can be indicators of CCE;

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

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE identify cases.

Referring cases

Where CSE or CCE, or the risk of it is suspected, staff will discuss the case with the dedicated member of staff for child protection. If after the discussion a concern still remains, local safeguarding procedures will be triggered, including a referral to the LA.

Support

The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as need.

11. Homelessness

The DSL and Deputy(s) will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following;

- Household debt

- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because they have referrals to the Local Housing Authority do not replace referrals to CSPOA where a child is being harmed or at risk of being harmed.

12. County Lines Criminal Activity

- County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.
- Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

13. Pupils with family members in prison

- Pupils with a family member in prison will be offered pastoral support as necessary.
- They will receive a copy of ‘Are you a young person with a family member in prison’ from Action for Prisoners Families where appropriate and allowed the opportunity to discuss questions and concerns.

14. Pupils required to give evidence in court

- Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered pastoral support.
- Pupils will also be provided with the booklet ‘Going to Court’ from HM Courts and Tribunals Service where appropriate and allowed the opportunity to discuss questions and concerns.

15. Contextual safeguarding

- Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of the incidents – this is known as contextual safeguarding.

- Assessment of pupils' behaviour will consider whether there are wider environment factors that are a threat to their safety and/or welfare.
- The school will provide as much contextual information as possible when making referrals to CSPOA.

16. Preventing radicalisation

- Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.
- The school will actively assess the risk of pupils being drawn into terrorism.
- Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.
- Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include making a referral to the [Prevent.homeoffice.gov.uk/referrals](https://www.prevent.homeoffice.gov.uk/referrals). The school will work with local safeguarding arrangements as appropriate.
- The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.
- Any concerns over radicalisation will be discussed with the child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

The DSL and all staff members will undertake Prevent Awareness Training on how to protect children against the risk of radicalisation.

Risk Indicators

Indicators of an identity crisis:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis:

- Family tension
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations:

- Perceptions of injustice
- Feelings of failure
- Rejection of civil life

Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Making a Judgement

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distribution extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress

choices?

- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crime?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil a victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, as a result of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made, however, concerns are most likely to require a police investigation as part of the [homeoffice.gov.uk/prevent](https://www.homeoffice.gov.uk/prevent) referrals.

Referrals can also be submitted to the following email address;
preventreferrals@thamesvalley.pnn.police.uk

The [homeoffice.gov.uk/prevent](https://www.homeoffice.gov.uk/prevent) ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before the vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The [homeoffice.gov.uk/prevent](https://www.homeoffice.gov.uk/prevent) identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

Extremist Speakers

The school will carry out checks to monitor guest speakers in order to prevent speakers who may promote extremist views from using the school premises.

Building children's resilience

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British Values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

The school will utilise the following resources:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The [homeoffice.gov.uk/prevent](https://www.homeoffice.gov.uk/prevent) referrals
- The Education Against Hate website
- Counter Terrorism and Security Act 2015

17. Upskirting

All staff should be made aware that 'upskirting' is now a criminal offence. A definition has been included which describes upskirting as "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm"(DfE, 2019a).

18. Serious Crime/Violence

The school has a duty to recognise where pupils may be at risk from serious crime. The guidance sets out what school staff should look out for;

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include;

- Increased absence from school
- Change in friendships or relationships with older individual or groups
- A significant decline in performance
- Signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs
- Staff should report immediately any concerns that a child may be carrying, using or intending to use a weapon.
- The DSL will assess risks associated with serious violence, gang affiliation, organised crime and weapon carrying and take appropriate safeguarding action.
- Staff should recognise that children exposed to serious violence may also be victims of exploitation and abuse.

Advice for staff is provided in the Home Office's Preventing Youth Violence and Gang Involvement and its Criminal Exploitation of Children and Vulnerable Adults, County Lines Guidance (DfE, 2019a).

19. Children Absent from Education and Attendance

The Federation recognises that both persistent absence and missing education may be indicators of safeguarding concerns including abuse, neglect, sexual exploitation, criminal exploitation, child sexual abuse and mental health difficulties.

Attendance concerns will be considered through a safeguarding lens and not solely as a behaviour or attendance issue.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children. We will monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2026) the school has;

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they leave school to be home educated and move away from the school's location, remain medically unfit beyond compulsory school age, are permanently excluded.

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Admissions Register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending.

The school will notify the LA within five days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

Two emergency contact details will be held for each pupil where possible.

Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live

- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will securely transfer pupils' data.

In order to ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admissions register, in accordance with the Education (Pupil Registration)(England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents/carers, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if

applicable

- The grounds for removal from the admissions register under Regulation 8 of the Education (Pupil Registration)(England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school.

The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

The school will also highlight any other necessary contextual information including safeguarding concerns.

20. Pupils with SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

The school recognises that pupils with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and understands that further additional barriers may exist when recognising abuse and neglect in this group of pupils. Not only is physical abuse a barrier, but mental health conditions may cause barriers too for reporting concerns;

Staff should be aware of the following:

- Assumptions that indicators of possible abuse such as behaviour, mood or injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's Senco, as well as the pupil's family where appropriate, to ensure that the pupil's needs are effectively met. Governing bodies and the school should consider extra pastoral support and attention, along with appropriate support for communication is in place for this group of pupils.

21. Young Carers

The Federation recognises that young carers are at increased risk of educational disadvantage, emotional harm, attendance difficulties and mental health concerns.

Staff should be alert to indicators that a child may be providing care to a family member and ensure timely support, assessment and referral through Family Help pathways where appropriate.

Young carers should receive appropriate pastoral support and reasonable adjustments to minimise the impact of caring responsibilities upon attendance, wellbeing and educational outcomes.

22. Children with Medical Conditions

Children with medical conditions may face additional safeguarding vulnerabilities, including increased absenteeism, social isolation, emotional distress, reduced access to education and barriers to reporting abuse.

Safeguarding planning should take account of the child's medical needs and ensure multi-agency support where appropriate.

23. Mental Health

Mental health concerns may be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation.

Staff should be alert to:

- significant changes in behaviour
- withdrawal from friendships
- deterioration in attendance
- persistent low mood
- anxiety
- ongoing sleep difficulties
- self-harm indicators
- neglect of personal care

Where staff believe that a child presents an immediate risk to themselves or others, emergency services should be contacted without delay and the DSL informed immediately.

Mental health concerns should be considered alongside safeguarding risks and not viewed in isolation

24. Alternative Provision

The school will remain responsible for pupil's welfare during their time at an alternative provider.

When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on their staff.

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

25. Elective Home Education

The DfE recognise that 'many home educated children have an overwhelmingly positive learning experience'. However, it can also 'mean some children are less visible to the services that are there to keep them safe and supported in line with their needs'.

Where a parent has expressed their intention to remove a child from school with a view to educating at home, it is recommended that LA's, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

26. Work Experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

27. Homestay Exchange Visits

School arranged homestays in the UK

Where a school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of stay.

In such cases, the school is the regulated activity provider, therefore, the school will obtain all the necessary information required, including DBS enhanced certificate with barred list information, to inform its assessments of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host.

In addition to the responsible adults, the school will consider a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School arranged homestays abroad

The school will liaise with partner schools to discuss and agree the arrangements in place for the visit.

The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commissioner of the Country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.

Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

28. Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

School is aware that while most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

School has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

On admission to the school, we will take steps to verify the relationship of the adults to

the child who is being registered.

29. Child Trafficking and Modern Slavery

Child trafficking and modern slavery are child abuse. Many children and young people are trafficked through the UK from other countries like Vietnam, Albania and Romania. Children are also trafficked around the UK. Trafficking is where children and young people are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for;

- Benefit fraud
- Forced marriage
- Domestic slavery like cleaning, cooking and childcare
- Forced labour in factories and agriculture
- Committing crimes, like begging, theft, working on cannabis farms or moving drugs

Signs of trafficking may be; spend a lot of time doing household chores, not be registered with a GP, live in low-standard accommodation, have no access to their parents or guardians, have money or things you wouldn't expect them to have, have injuries from workplace accidents, be orphaned or living apart from their family, are reluctant to share personal information.

Reporting Child Trafficking

If you think a child or young person is in danger, contact the Police on 999.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in the Modern Slavery Statutory Guidance. Modern Slavery: how to identify and support victims – GOV.UK (www.gov.uk).

Contact the Modern Slavery Helpline to get help, report a suspicion or seek advice. Call 0800 02 1700 or fill in their online form. There is also advice and support given on the NSPCC website.

30. Concerns about a pupil

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

- All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information

sharing.

- Where the DSL is not available to discuss the concern with, staff members will contact one of the deputy DSL's with the matter.
- If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.
- The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.
- Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.
- If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.
- If early help is appropriate, the case will be kept under constant reviews. If the pupil's situation does not improve, a referral will be considered.
- All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and added to the CPOMS system.
- If a pupil is in immediate danger, a referral will be made to CSPOA and/or the police immediately.
- If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.
- Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.
- When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.
- An inter-agency assessment will be undertaken where a child and their family could benefit from co-ordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

31. Children Potentially at Greater Risk

- Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
- Where children need a social worker, this should inform decisions about

safeguarding (for example, responding to unexplainable and or/persistent absences from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

- Vulnerable groups include; young carers, children with medical conditions, children in kinship care, pregnant pupils and young carers, children displaying harmful behaviours, children requiring mental health support.
- Findings from the Children In Need Review, '[Improving the educational outcomes of Children In Need of help and protection](#)' contains further information; the conclusion of the review, '[Help, protection, education](#)' sets out action Government is taking to support this.

32. Children requiring mental health support

- Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.
- Mental health problems, can in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in '[mental health and behaviour in schools guidance](#)'.

33. Family Help and Early Help

The Federation adopts the Families First and Family Help model and will work with children and families at the earliest opportunity to prevent concerns escalating.

Community-based support, universal services and targeted Family Help interventions should be considered before concerns reach statutory thresholds where appropriate.

- Family Help and Early Help means providing support as soon as a problem emerges, at any point in a child's life.
- Any pupil may benefit from Family Help and Early Help, but in particular staff will be alert to the potential need for early help for the children who:
 - Are disabled and have specific additional needs.
 - Have SEND (whether or not they have a statutory EHC plan).
 - Has a mental health need.
 - Is a young carer
 - Showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
 - Are frequently missing/going missing from home or care.
 - Misuse drugs or alcohol.

- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.
- Has experienced multiple suspensions, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit.
- Family Help and Early Help will also be used to address non-violent harmful sexual behaviour to prevent escalation.
- All staff will be made aware of the local Family Help and Early Help process and understand their role in it.

The DSL will take the lead where Family Help and Early Help is appropriate.

34. Managing referrals

The reporting and referral process outlined in the Appendices will be followed accordingly.

- All staff members, particular the DSL, will be aware of the LA's managing referrals. The DSL will provide staff members with clarity and support where needed.
- When making a referral to CSPOA or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.
- The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.
- The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.
- Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made.
- Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.
- The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSPOA.
- Where CSPOA decide that a statutory investigation is not appropriate, the school will give consideration to referring the incident again if it is believed that the pupil is at risk of harm.
- Where CSPOA decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will give consideration to the use of other support mechanisms, such as early help and pastoral support.
- At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so.

- Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.
- The school will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

35. Allegations against staff (including low level concerns)

Allegations that may meet the harm threshold

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors. Where the headteacher is the subject of the allegation, the case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with

the individual, making it clear that this is not a punishment and parents/carers have been consulted

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. 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
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named

contact at the school and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- 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 (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the 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 school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the

child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

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

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

- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns 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 Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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 harm 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

36. Dealing with allegations of abuse against staff - Whistleblowing

- All allegations will be dealt with in line with the school's Whistleblowing Policy.
- Where an allegation is substantiated and the individual is dismissed or resigns, the school will consider referring the matter to the Teaching Regulation Agency (TRA) for consideration for a prohibition order.
- If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSPOA.

37. Child on Child Abuse, Harassment and Violence - Allegations of abuse against other pupils

Child-on-child abuse remains a safeguarding issue for both the victim and the alleged perpetrator.

Preventative interventions and early support should be considered wherever concerns emerge to reduce escalation and further harm

Child -On-Child abuse behaviours include, harassment, violence, misogyny, harmful sexual behaviour, online abuse, coercion and control and image-based abuse.

Sexual harassment

- Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline.
- Sexual harassment violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment includes:
 - Sexual comments.
 - Sexual "jokes" and taunting.
 - Physical behaviour, such as deliberately brushing against another pupil.
 - Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence refers to the three following offences;

- Rape: A person (A) commits an offence of rape if he intentionally

penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

- by Penetration: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Harmful sexual behaviours

The term harmful sexual behaviour is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include;

- Using sexually explicit words and phrases.
 - Inappropriate touching.
 - Sexual violence or threats.
 - Full penetrative sex with other children or adults.
 - Sexual interest in adults or children of very different ages to their own.
 - Forceful or aggressive sexual behaviour.
 - Compulsive habits.
 - Sexual behaviour affecting progress and achievement.
- Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not).

A preventative approach

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.

The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour

- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

Awareness

- All staff will be aware that child-on-child abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.
- The Federation recognises that children questioning their gender may experience vulnerability, distress, bullying and safeguarding risks.
- Decisions relating to support and safeguarding will be made on an individual basis, involving parents where appropriate, whilst maintaining the child's welfare as the paramount consideration.
- Safeguarding concerns should not be conflated with identity questions and each case should be risk assessed individually.
- LGBT children can be targeted by their peers. In some cases, children who are perceived to be LGBT, whether they are or not, can be just as vulnerable to abuse as LGBT children.
- The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex. Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.
- Support available if a child has been harmed, is in immediate danger or at risk of harm
- If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSPOA.
- Within one working day, a social worker will respond to the referrer to explain the action that will be taken.
- Support available if early help, section 17 and/or section 47 statutory assessments are appropriate.
- If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

- Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSPOA. The DSL will be aware of the local process for referrals to both CSPOA and the police.
- Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.
- The school has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support available if reports include online behaviour

- Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
- If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.
- Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

- Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.
- If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident, however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSPOA where necessary. If staff are in any doubt, they will speak to the DSL.
- Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same.
- All staff will be trained to handle disclosures.

Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.
- The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

Confidentiality

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSPOA.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

When deciding on the steps to take, the school will consider the role of the social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (either on paper or electronically) and kept under review.

Taking action following a disclosure

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental
- Factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.
- Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.
- For reports of rape and assault by penetration, whilst the school

establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

- For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.
- In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.
- In cases where nudes or semi-nudes have been shared, school will follow guidance by the UK Council for Internet Safety (UKCIS). Guidance: Sharing nudes and semi-nudes (March 2024); and Child sexual abuse material generated by artificial intelligence (June 2025).

Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment;

- Managing internally
- Providing early help
- Referral to CSPOA
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons behind decisions will be recorded either in paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.

- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.
- Managing internally

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing early help

The school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referral to CSPOA

If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSPOA. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSPOA.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with CSPOA to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

If CSPOA decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

If the school agrees with the decision made by CSPOA, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSPOA. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSPOA and any appropriate specialist agencies.

The DSL and governing body will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

The DSL will be aware of local arrangements and specialist units that investigate child

abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

The school will work with CSPOA and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

Managing delays in the criminal justice system

The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restriction deemed reasonable and proportionate with regards to the perpetrator's timetable.

The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.

The alleged perpetrator is also likely to require ongoing support, as they have also been

through a difficult and upsetting experience.

Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

The school will provide a physical space for victims to withdraw to.

Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.

Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.

If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

When considering the support required for an alleged perpetrator, the school will take into account:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.

- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

When making a decision, advice will be taken from CSPOA, specialist sexual violence services and the police as appropriate.

If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSPOA will be consulted where necessary.

The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time.

The school will be clear whether action taken is disciplinary, supportive or both.

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the pupil will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other children

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support

It is likely that children will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

38. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

- Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.
- Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.
- Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.
- During disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.
- Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.
- Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others.
- Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.
- Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved.
- Discussions with parents will not take place where they could potentially put a pupil at risk of harm.
- Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes etc., with the reasons behind decisions being explained and the available support discussed.
- External agencies will be invited to these discussions where necessary.
- Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.
- Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share
- any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

39. Online safety, AI, Filtering & Monitoring Systems

Staff should recognise that safeguarding risks may arise through generative artificial intelligence (AI), including AI-generated abuse, manipulated imagery, synthetic media and inappropriate AI interactions.

Online safety education should include:

- misinformation
- disinformation
- conspiracy theories
- AI-generated content
- online exploitation
- harmful online communities

The Federation will review filtering and monitoring systems at least annually and maintain an auditable record of those reviews.

- Children at The Federation are taught about how they can keep themselves and others safe, including online. To be effect, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- Through training, all staff members will be made aware of the following:
- The four C's of keeping children safe online which includes: Content, Contact, Conduct and Commerce. Detailed definitions of this are covered in the online e-learning statutory safeguarding training.
- Staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers on-line, this can take the form of abusive, harassing, misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity
- The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material, in accordance with the school's E-safety Policy. It will also protect pupils and staff from harmful and inappropriate content online, which could be legal or illegal, and could include; pornography, promotion of self-harm and or/suicide, misogyny, racism, fake news, extremist views.
- The use of mobile phones by staff and pupils is closely monitored by the school, in accordance with the IT Acceptable Use Policy. This policy details how mobile phones, cameras and other electronic devices with image sharing capabilities are used within the school.
- The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

- It is important to note that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

All staff should follow policies and procedures, report any problems, and monitor what's happening on screens in school.

40. Information sharing

Staff must never assume another professional has acted.

Information should be shared proactively and as early as possible to identify and manage risks to children.

Staff should utilise DfE Information Sharing Guidance and Data Protection Guidance for Schools where appropriate.

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between practitioners and local agencies. This should include arrangements are in place that set out clearly the processes and principles for sharing information within the school and with three safeguarding partners, other organisations, agencies and practitioners as required. School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Staff should not assume a colleague, or other professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (GDPR). DPA and GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to a designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare of children.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Where children leave the school, the designated safeguarding lead should ensure their child protection file is transferred to the new school as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools should ensure key staff such as

designated safeguarding leads and Inclusion Leads are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

Please refer to 'Information Sharing: advice for practitioners providing safeguarding services' (DfE, May 2024) – <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>.

41. Safer recruitment

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- a. Are responsible on a daily basis for the care or supervision of children.
- b. Regularly work in the school at times when children are on the premises.
- c. Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Pre-employment checks

The governing board will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID, birth certificate and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the [TRA Teacher Services' System](#).
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the [Gov.UK](#) website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has

imposed.

- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.
- A DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.
- Online searches will be undertaken for shortlisted candidates in accordance with KCSIE 2026 requirements.

Internal Candidates

If an individual moves from a position within the school that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out. Aside from this specific circumstance, the school is not required to request a DBS check or barred list check for staff moving roles internally.

References from internal candidates will always be scrutinised before appointment.

ITT Candidates

Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out.

Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

Governors

[Maintained schools] An enhanced DBS check will be carried out for each member of the governing board. Where a governor also engages in regulated activity, a barred list check will also be requested. The school will also contact the TRA using Teacher Services to check if a proposed governor is barred as a result of being subject to a section 128 direction. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check.

Those who have lived or worked outside of the UK

- For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

Barred list check

- An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.
- If there are concerns about an applicant, an enhanced DBS check with

barred list information may be requested, even if he/she has worked in regulated activity in the three months prior to appointment.

- Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

- References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.
- References will only be accepted from a senior person and not from a colleague.
- References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.
- References will be obtained prior to interviews taking place and discussed during interviews.
- Open testimonials will not be considered.
- Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

- The Federation will assess volunteer activity in accordance with revised regulated activity arrangements. The removal of the supervision exemption may mean additional volunteers require enhanced DBS checks with barred list information. Individual risk assessments will be completed as required.
- An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.
- Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting washing, bathing and dressing for reasons of age, illness or disability.
- A supervised volunteer who regularly teaches or looks after children is not in regulated activity.
- The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.
- Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.
- A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Contractors

- The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS

check.

- Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.
- Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

Out of School Providers

- The provider is responsible for their own safeguarding and child protection policies; however, the school may refer any concerns they have about the provider to the local authority.

Data retention

- DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.
- A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

- The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

42. Single central record (SCR)

The school keeps a SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR;

- An identify check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received, which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

Safeguarding concerns relating to trainee teachers will be managed in accordance with procedures for agency, supply and contracted staff.

If any checks have been conducted for volunteers, this will also be recorded on the SCR.

If risk assessments are conducted to assess whether a volunteer should be subject to a DBS check, the risk assessment will be recorded.

The college will record on the SCR whether the employee's position involves relevant activity, i.e. regularly caring for training, supervision or being solely in charge of persons aged under 18. Written confirmation that supply agencies have completed all relevant checks will also be included.

43. Staff Suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) Regulations 2009.

A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

Live in the same household as someone who is disqualified by virtue of one or two of the above reasons (known as disqualification by association).

All staff members are required to sign the [declaration form](#) provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment.

A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

44. Training

All staff will receive annual safeguarding training reflecting KCSIE 2026 requirements.

The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Behavioural Policy
- The Staff Code of Conduct
- The identity of the DSL and any deputies

- The role of the DSL and deputy DSLs

Safeguarding training will include this year's KCSIE 2026 updates;

- Family Help reforms
- mental health
- serious violence
- child-on-child abuse and harmful sexual behaviour
- AI and online safety
- misinformation and disinformation
- young carers
- medical conditions
- attendance as a safeguarding issue
- gender-questioning children
- information sharing

All staff, including non-teaching staff, must read KCSIE 2026, Part One.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.

Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep previously LAC safe.
- Child criminal exploitation and the need to refer cases to the National Referral Mechanism.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

The DSL will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

The DSL and their deputy(s) will undergo online safety training to help them recognise the additional risks that pupils with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support pupils with SEND to stay safe online

Online training will also be conducted for all staff members as part of the overall safeguarding approach.

45. Monitoring and review

This policy is reviewed annually by the DSL's and Headteachers

Any changes made to this policy by the Headteachers and DSL's will be communicated to all members of staff.

All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme

The next scheduled review date for this policy is September 2027.

42. Useful Telephone Numbers

Children's Single Point of Access: 0118 937 3641

Access & Assessment Team: 0118 9373770

Out of Hours Emergency Team: 01344 786543

Local Authority Designated Officer (LADO): 0118 9372684

43. Useful Links

Reading Local Safeguarding Board

<http://www.berkshirewestsafeguardingchildrenpartnership.org.uk>

Child Protection Procedures: <http://proceduresonline.com/berks>

'What to do if you're worried a child is being abused' Dec 2006 HM
Government

http://www.dh.gov.uk/Publicationsandstatistics/lettersandcirculars/healthservicecirculars/DH_400420

Appendix 1 – Staff Disqualification Declaration



Staff Childcare Disqualification Declaration

School	
---------------	--

Please note that all information disclosed on this form will be dealt with confidentially, and will only be shared with people involved in an advisory or decision making capacity. Details to confirm that this check has been carried out will be recorded in school systems, and the form destroyed.

Name		Post	
<i><u>Please circle one option for every question:</u></i>			
Section 1 – Orders or other restrictions			
Have any orders or other determinations related to childcare been made in respect of you?			YES / NO
Have any orders or other determinations related to childcare been made in respect of a child in your care? e.g. have your own children been taken into care?			YES / NO
Have any orders or other determinations been made which prevents you from being registered in relation to child care, children's homes or fostering?			YES / NO
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in the Schedule 1 of the Regulations ? Available from the school office or at the link below: http://www.legislation.gov.uk/ukxi/2009/1547/schedule/1/made			YES / NO
Are you barred from working with Children (Disclosure and Barring (DBS))?			YES / NO
Section 2 – Specified and Statutory Offences			
Have you ever been cautioned, reprimanded, given a warning for, or convicted of:			
Any offence against or involving a child? (a child is a person under the age of 18)			YES / NO
Any violent or sexual offence against an adult?			YES / NO
Any offence under the Sexual Offences Act?			YES / NO
Any other relevant offence? Available from the school office or at the links below: http://www.legislation.gov.uk/ukxi/2009/1547/schedule/2/made http://www.legislation.gov.uk/ukxi/2009/1547/schedule/3/made			YES / NO
Have you ever been cautioned, reprimanded, given a warning for, or convicted of any similar offence in another country?			YES / NO

Section 3 – Provision of Information			
If you have answered YES to any of the questions above you should provide details below. You may supply this information separately if you so wish, but you must do so without delay.			
Details of the order, restriction, conviction, caution, etc.			
The date(s) of these			
The relevant court(s) or body(ies)			
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions a DBS Certificate may be provided.			
Section 5 -Declaration			
In signing this form, I confirm that the information provided is true to the best of my knowledge and that:			
I understand my responsibilities to safeguard children.			
I understand that I must notify my Headteacher/Principal immediately of anything that affects my suitability, now or in the future , including any cautions, warnings, convictions, orders or other determinations that would render me disqualified from working with children.			
Signed			
Print Name		Date	

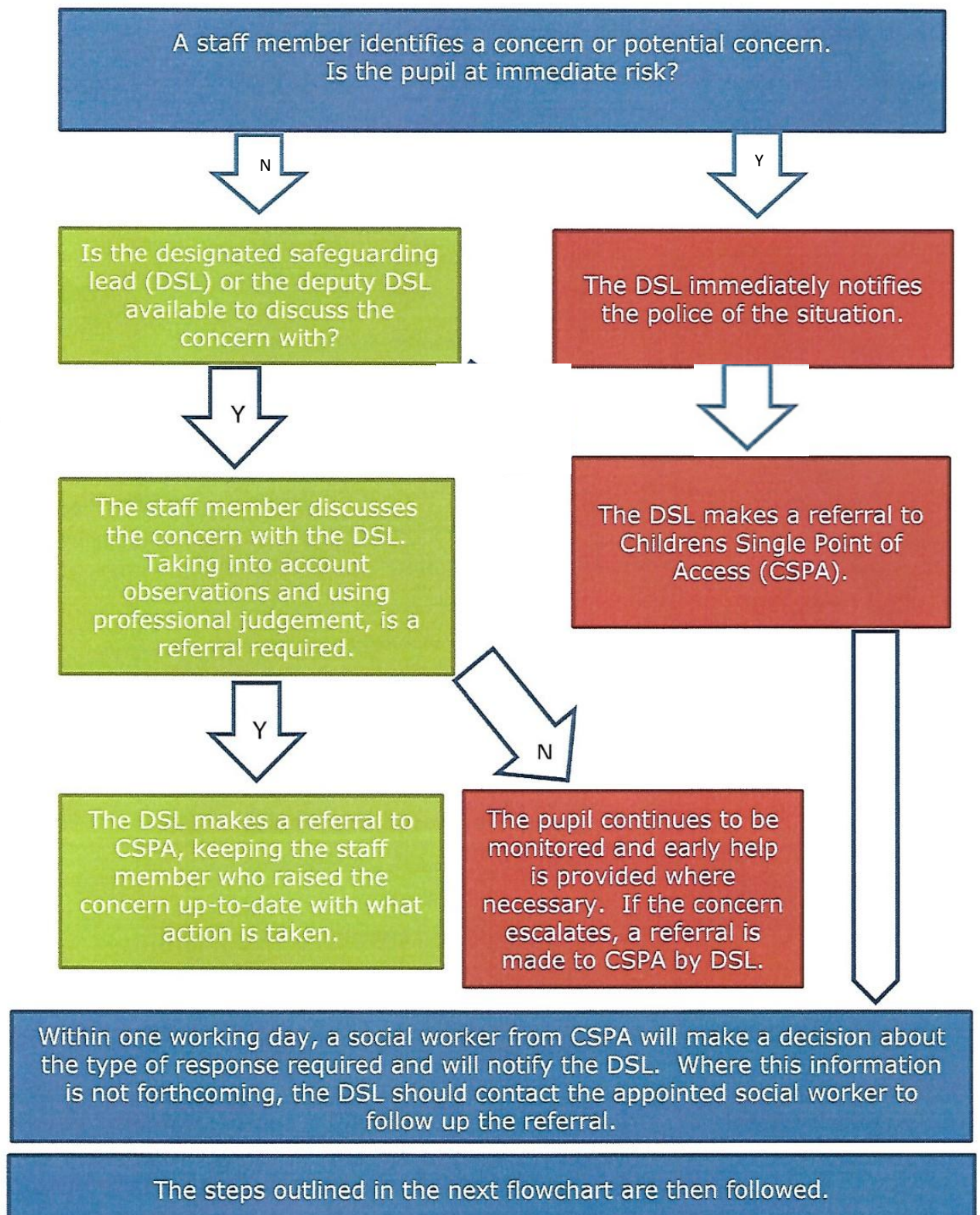
Please note that all information disclosed on this form will be dealt with confidentially, and will only be shared with people involved in an advisory or decision making capacity. Details to confirm that this check has been carried out will be recorded in school systems, and the form destroyed.

Appendix 2. Safeguarding Reporting Process

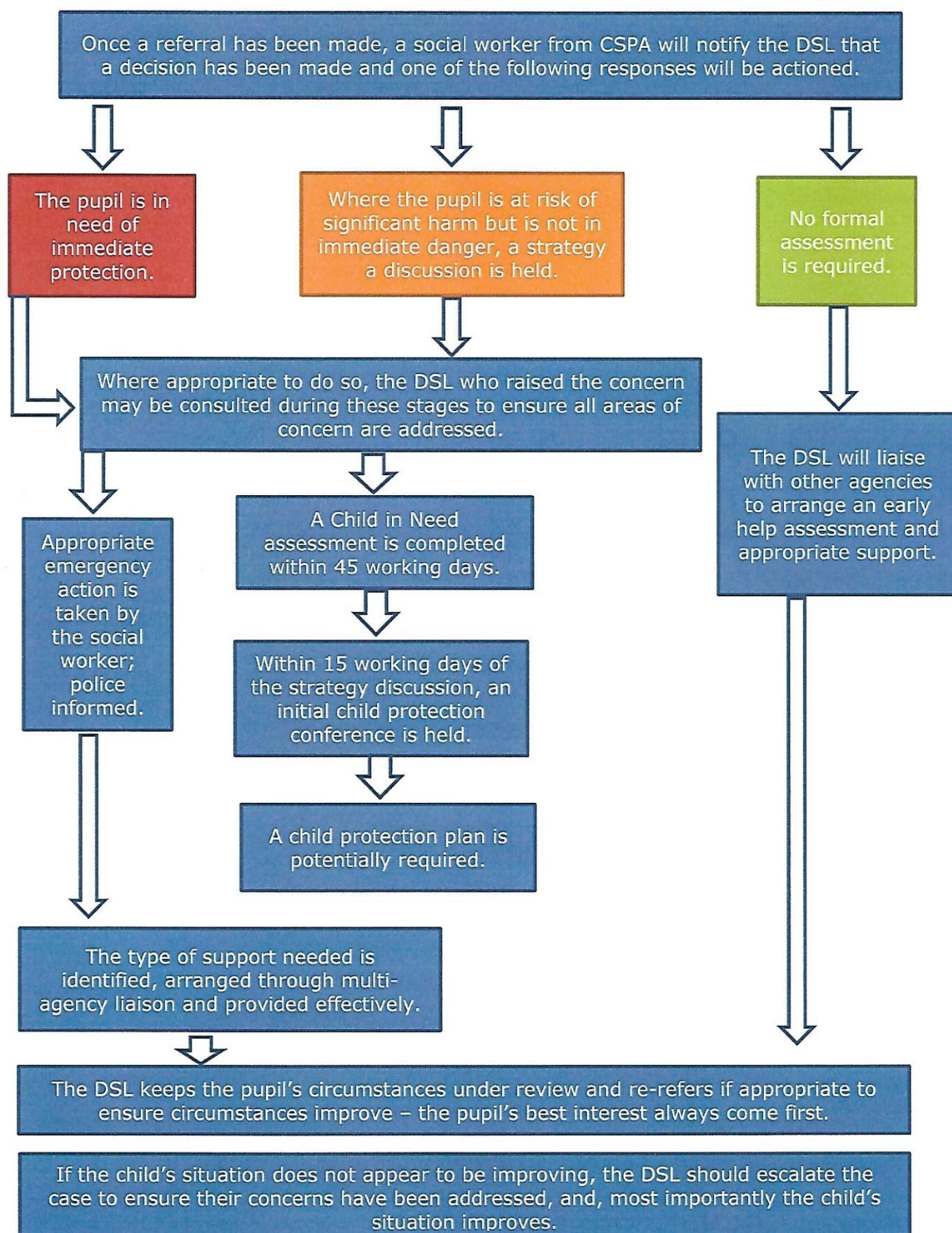
The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



After a referral is made



Appendix 3. Contacts and Advice

Expert organisations

- d. [Barnardo's](#)
- e. [Lucy Faithfull Foundation](#)
- f. [NSPCC](#)
- g. [Rape Crisis](#)
- h. [University of Bedfordshire: Contextual Safeguarding](#)
- i. [UK Safer Internet Centre](#)

Support for victims

- j. [Anti-Bullying Alliance](#)
- k. [MoJ Victim Support](#)
- l. [Rape Crisis](#)
- m. [The Survivor's Trust](#)
- n. [Victim Support](#)

Toolkits

- o. [Brook](#)
- p. [NSPCC](#)
- q. [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

Further information on confidentiality and informationsharing

- r. [Gillick Competency Fraser Guidelines](#)
- s. [Government Information Sharing Advice](#)
- t. [Information Commissioner's Office: Education](#)
- u. [NSPCC: Things to Know and Consider](#)

Further information on sexting

- v. [UK Council for Child Internet Safety: Sexting Advice](#)
- w. [London Grid for Learning – Collection of Advice](#)

Support for parents

- x. [Parent zone](#)
- y. [Parentsafe – London Grid for Learning](#)
- z. [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- aa. [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)
- bb.

Appendix 4. CPOMS Safeguarding/Child Protection Reporting Guidance Notes

If you have concerns whatsoever about a child's safety or wellbeing;

- Complete the information on the CPOMS system (Child Protection On-Line Monitoring System).
- An alert will be immediately sent to the DSL's.
- When adding the information ensure that the information you give is clear, precise and factual.
- If the child has marks or injuries that could be of concern complete a Body Map on the CPOMS.
- Record your observations on behaviour seen.
- Record any comments by the child as verbatim as possible.
- Record any comments by the parents/adults.
- Describe what it is that leads you to think there is a concern.
- Submit via CPOMS on the same day and if so immediately.
- If you have support needs as a result of what you have observed or experienced, make these known to the Designated person now or at a later stage.

Sharing Information

- Every case is different and therefore it is impossible to write strict guidance on who needs to be informed about an incident.
- The general premise should be that the child's well-being is paramount and this should be the primary consideration when deciding what information should be shared and with whom.
- The discussion between the person reporting the incident and the Designated person should leave the person who made the report feeling clear about what, if anything, they should share and with whom.
- Do not share information with anyone else until you have discussed the situation with the Designated person.