

**Statutory:**

Policy provided centrally for adoption by schools with minimal amendment to the core text. Changes are allowed to the text where indicated

# Child Protection and Safeguarding Policy 2026/27

Consistent with [Keeping children safe in education - GOV.UK](https://www.gov.uk/government/consultations/keeping-children-safe-in-education)

Jennett's Park CE Primary

|                          |                               |
|--------------------------|-------------------------------|
| <b>Approved by:</b>      | <b>ODST Board of Trustees</b> |
| <b>Date:</b>             | <b>July 2026</b>              |
| <b>Next review date:</b> | <b>31 July 2027</b>           |

|                           |                                  |
|---------------------------|----------------------------------|
| <b>Adopted by school:</b> | <b>Jennett's Park CE Primary</b> |
| <b>Date:</b>              | <b>July 26</b>                   |

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## Local and school-based information

| Key Personnel/Departments                           |                                                      | Name (s)                                                                           | Contact details                                                                                                             |
|-----------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| School based information                            | The school's Designated Safeguarding Lead (DSL)      | Liz Savage                                                                         | <a href="mailto:esavage@jennetts.bonitas.org.uk">esavage@jennetts.bonitas.org.uk</a><br><br>07523357127 or 01344301269      |
|                                                     | The school's Deputy DSL(s)                           | Gemma Robinson<br><br>Carla Szadowski<br>David Page<br>Jen Allen<br>Shelley Thorpe | Contactable via <a href="mailto:secretary@jennetts.bonitas.org.uk">secretary@jennetts.bonitas.org.uk</a><br><br>01344301269 |
|                                                     | The school's nominated LGB member for Safeguarding   | Stuart Marlow                                                                      | <a href="mailto:smarlow@jennetts.bonitas.org.uk">smarlow@jennetts.bonitas.org.uk</a>                                        |
|                                                     | The school's Chair of Local Governing Body (LGB)     | <b>Tessa Parker Mann</b>                                                           | <a href="mailto:tparkermann@jennetts.bonitas.org.uk">tparkermann@jennetts.bonitas.org.uk</a>                                |
|                                                     | The school's named 'Prevent' lead                    | Liz Savage                                                                         | <a href="mailto:esavage@jennetts.bonitas.org.uk">esavage@jennetts.bonitas.org.uk</a><br><br>07523357127 or 01344301269      |
|                                                     |                                                      |                                                                                    |                                                                                                                             |
| Local Safeguarding Children Partnership information | The School's Local Safeguarding Children Partnership |                                                                                    | <a href="#">Bracknell Forest Safeguarding Board</a>                                                                         |

|               |                                                                                                                    |                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------|--------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ion<br>(LSCP) | (LSCP)<br>name                                                                                                     |                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                             |
|               | LSCP<br>website                                                                                                    |                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                             |
|               | LSCP's<br>threshol<br>d of<br>needs                                                                                |                                                                                                                                                            | <a href="https://bracknellforestsafeguarding.org.uk/p/professionals/multi-agency-risk-framework">https://bracknellforestsafeguarding.org.uk/p/professionals/multi-agency-risk-framework</a>                                                                                                                                                                                                 |
|               | Early<br>Help /<br>Family<br>Help<br>informat<br>ion                                                               |                                                                                                                                                            | <a href="https://bracknellforest.fsd.org.uk/kb5/bracknell/directory/service.page?id=A4J3fsFMXBo&amp;familychannel=0">https://bracknellforest.fsd.org.uk/kb5/bracknell/directory/service.page?id=A4J3fsFMXBo&amp;familychannel=0</a>                                                                                                                                                         |
|               | Local<br>Authorit<br>y<br>Designat<br>ed<br>Officers<br>(LADOs)                                                    | Alison Small                                                                                                                                               | <a href="mailto:lado@bracknell-forest.gov.uk">lado@bracknell-forest.gov.uk</a><br>01344 351572                                                                                                                                                                                                                                                                                              |
|               | Multi<br>Agency<br>Safeguar<br>ding<br>Hub<br>(MASH)<br><br>Out of<br>hours<br>Emerge<br>ncy Duty<br>Team<br>(EDT) |                                                                                                                                                            | <a href="mailto:mash@bracknell-forest.gov.uk">mash@bracknell-forest.gov.uk</a><br><br>01344 352005<br><br>01344 351999                                                                                                                                                                                                                                                                      |
|               | Police                                                                                                             |                                                                                                                                                            | Call 999 in an emergency<br>101<br><a href="#">Home   Thames Valley Police</a>                                                                                                                                                                                                                                                                                                              |
|               | The<br>Local<br>Authorit<br>y's<br>Prevent<br>Duty                                                                 | Parents' Booklet<br>(educateagainsth<br>ate.com)<br><br>ACT Early  <br>Prevent<br>radicalisation<br>0800 011 3764<br><br>Channel helpline<br>020 7340 7264 | <a href="mailto:preventreferralsbracknell@thamesvalley.pnn.police.uk">preventreferralsbracknell@thamesvalley.pnn.police.uk</a><br><br><a href="https://www.bracknell-forest.gov.uk/crime-and-emergencies/crime-and-community-safety/preventing-violent-extremism-0">https://www.bracknell-forest.gov.uk/crime-and-emergencies/crime-and-community-safety/preventing-violent-extremism-0</a> |

|  |                                      |                      |                                                                                                                    |
|--|--------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------------------|
|  | Children missing from education team |                      | <a href="#">Children Missing Education   Can-Do   Bracknell Forest</a>                                             |
|  |                                      | Virtual School       | <a href="mailto:virtual.school@bracknell-forest.gov.uk">virtual.school@bracknell-forest.gov.uk</a><br>01344 352777 |
|  |                                      | Young Carers Service | <a href="mailto:Young.carers@bracknell-forest.gov.uk">Young.carers@bracknell-forest.gov.uk</a>                     |
|  |                                      | Make Safe            | <a href="mailto:makesafe@bracknell-forest.gov.uk">makesafe@bracknell-forest.gov.uk</a><br>01344352020              |
|  |                                      | NSPCC Helpline       | Call: 0808 800 5000 Email <a href="mailto:help@NSPCC.org.uk">help@NSPCC.org.uk</a> .                               |

The Headteacher, local governing body and staff recognises its responsibility for safeguarding and child protection.

## 1. INTRODUCTION

- 1.1. It is essential that everybody working in school understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect exploitation and harm. The school is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the child.
- 1.2. Pupils' welfare is of paramount concern. The Local Governing Body will ensure that the school will safeguard and promote the welfare of pupils and work together with agencies to ensure that the school has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested.
- 1.3. This policy provides the basis for good practice within the school for safeguarding work. It should be read in conjunction with Keeping Children Safe in Education. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.
- 1.4. This policy applies to all members of staff in the school, including all permanent, temporary and support staff, LGB members, volunteers, contractors and external service or activity providers.
- 1.5. In line with Working Together to Safeguard Children (latest statutory version), the school recognises that safeguarding is a shared responsibility across all agencies and applies to all children, including unborn babies, children living with their birth or extended families, those in kinship care, children who are looked after, and those previously looked after. The school adopts a child-centred and whole-family approach, ensuring the voice, lived experience, wishes and feelings of children are central to all safeguarding decision-making.

## 2. THE LEGAL FRAMEWORK

- 2.1. **This policy and the accompanying procedure have been developed in accordance with the** following statutory guidance and local safeguarding procedures:

*Working Together to Safeguard Children: Statutory framework: legislation relevant to safeguarding and promoting the welfare of children, December 2026: [Working together to safeguard children - GOV.UK](#)*

*Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges: [Keeping children safe in education - GOV.UK](#)*

## 3. ROLES AND RESPONSIBILITIES

- 3.1. The **Board of Trustees** retains strategic responsibility for safeguarding across all academies, including policy approval, assurance, and statutory compliance with Keeping Children Safe in Education.
- 3.2. The **Local Governing Body (LGB) and proprietors** are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.
- 3.3. The school has a named **Designated Safeguarding Lead (DSL)**, with overall designated responsibility for safeguarding. The **Deputy Designated Safeguarding Lead(s) (DDSLs)** ensures there is always appropriate cover for this role. The responsibilities of all Designated Safeguarding Leads are described in detail in Appendix B.

- 3.4. **All staff members, LGB members, volunteers, and external providers** know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child. The school expects all staff and leaders to actively challenge racism, discrimination and disproportionality in safeguarding practice, recognising how bias, inequality and lived experience may impact children and families' engagement with support and protection.
- 3.5. The school acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. The school also has a statutory duty to report and record any of the above incidents.
- 3.6. The school and local governing body take all reasonable action to limit children's exposure to the risks from the school's IT system and ensure the school has appropriate filters and monitoring systems in place and regularly review their effectiveness in line with national expectations.

#### 4. SUPPORTING CHILDREN

4.1. The school will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning; through PSHE, RHSE and other curriculum contexts, and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly.
- encouraging pupils to talk about feelings and deal assertively with pressures and are listened to, providing pupils with a range of appropriate adults to approach as needed.
- supporting children to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness whilst not condoning aggression or bullying.
- liaising and working together with other support services and those agencies involved in safeguarding children, including Early Help, Family Help and preventative services as required in *Working Together to Safeguarding Children*. Working in line with the Family Help approach and preventative services outlined in *Working Together to Safeguard Children*, contributing to coordinated, multi-agency support that brings together early help, targeted intervention and statutory support, with one plan led through a multi-disciplinary response.
- recognising that children may experience multiple and overlapping harms simultaneously, and ensuring that safeguarding responses, assessments and support plans do not focus on a single presenting issue in isolation.
- considering safeguarding and support needs during pregnancy, and contributing to pre-birth assessments and planning where concerns for an unborn child are identified.
- considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- having a Behaviour Policy that is aimed at supporting vulnerable pupils in the school. The Behaviour Policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.

- The school recognises that suspension, permanent exclusion, off-site direction, managed moves and alternative provision can be associated with increased safeguarding vulnerability. Before decisions relating to pupil movement are implemented, the school will consider any safeguarding concerns, SEND needs, mental health needs, social worker involvement, child in care status, and risks of exploitation, and will seek to identify and address underlying causes wherever possible.
- having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).
- acknowledging the importance of 'contextual safeguarding', <https://contextualsafeguarding.org.uk/> which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.
- alerting the authority if it is aware of any child being cared for under a Private Fostering arrangement. On admission to school, and at other times, the school will be vigilant in identifying any private fostering arrangement.
- acknowledging that a Looked After Child (LAC)/Child We Care For (CWCF), in kinship care, or has been previously looked after by the Local Authority potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these children.
- taking positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics, in order to meet their specific need/s. For example, taking positive action to support girls, if there was evidence that they were being disproportionately subjected to sexual violence or sexual harassment, or making reasonable adjustments for those identified as having special educational needs and/or a disability, such as experiencing communication barriers that may impact assessments around safeguarding.
- being aware that 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. The school will follow DfE guidance on Alternative Educational Provision: [Alternative provision - GOV.UK](https://www.gov.uk/government/publications/alternative-educational-provision)
- ensuring a comprehensive curriculum response to online safety and emerging technologies, including artificial intelligence (AI), enabling pupils to understand the benefits and risks of AI-generated content and how to identify misinformation, manipulation, exploitation and other online harms.

## 5. DEALING WITH A DISCLOSURE AND RECORD

5.1. If a member of staff has a concern about a child or if a child tells them they are being, or at risk of being, abused, exploited or neglected, staff will appropriately respond by listening and offering reassurance. Staff should:

1. Make an accurate factual record as soon as possible including details of:
  - Dates and times of their observations
  - Dates and times of any discussions in which they were involved
  - Any injuries
  - Explanations given by the child / adult
  - What action was taken
  - Any actual words or phrases used by the child
  - Any questions the staff member asked (remembering not to ask any leading questions)

**The records must be signed and dated by the author (or equivalent on electronic based records).**

2. Listen to wishes and feelings of the child, but not to promise any confidentiality. Records should evidence the child's wishes, feelings, lived experience and how these have informed professional decision-making
  3. Report it to the DSL/DDSL
  4. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
  5. In the absence of the DSL or DDSL, staff will refer directly to MASH or the child's social worker (if applicable) and the police (if appropriate) if there is a significant concern or to contact LCSS for advice and guidance.
  6. Concern forms are recorded digitally using CPOMS, a secure online system. [CPOMS StudentSafe](#)
- 5.2. Where concerns involve complex or multiple types of harm, the DSL will ensure that assessment, recording and decision-making reflect the full range of risks, rather than addressing concerns in isolation, and that the child's wishes, feelings and lived experience are clearly evidenced within records.
- 5.3. The DSL will ensure any decisions and justifications for those decisions will be recorded in writing with clear outcomes documented following any action taken.
- 5.4. The school will discuss any concerns with the child's parents. There may be occasions when this is not appropriate and school staff would consult with other agencies prior to involving parents. The school will record any decision not to discuss with parents and why.
- 5.5. Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.
- 5.6. If a pupil moves to another school, all safeguarding records will be transferred in accordance with UK GDPR to the child's receiving school/setting. These will be given to the receiving school and a receipt of delivery will be obtained. The school will ensure that when a pupil who is the subject of a Child Protection (CP) Plan leaves, their information is transferred to the new school within 5 school days and that the child's Social Worker is informed that the child has moved.
- 5.7. If the Headteacher is not the DSL, the DSL will ensure the Headteacher is kept informed of any significant concerns. All other staff are informed of concerns on a need-to-know basis.

## **6. THE ROLE OF AN APPROPRIATE ADULT IN SAFEGUARDING**

- 6.1. The Police and Criminal Evidence (PACE) act advises that "The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons", ([who are suspected of a criminal offence](#)). The AA is also expected to observe that the police are acting properly and fairly in relation to a vulnerable, detained person's rights and entitlements, as well as helping the detained person to understand their rights.

## **7. INFORMATION SHARING**

- 7.1. Staff and LGB members recognise that all matters relating to safeguarding are confidential.
- 7.2. All staff members have a professional responsibility to share information with other agencies to safeguard children.
- 7.3. All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.
- 7.4. We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information, and when information can be shared without consent.
- 7.5. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.
- 7.6. Data protection laws do not prevent the sharing of information where necessary to safeguard and promote the welfare of children. Concerns about information sharing must never stand in the way of protecting children.

## **8. MULTI AGENCY WORKING**

- 8.1. The school will contribute to community-based Family Help assessments and multi-agency plans where appropriate and support lead practitioners in delivering coordinated support for children and families. The school will develop and promote effective working relationships with other agencies, including those providing Family Help and preventive services, the Police and Children's Social Care.
- 8.2. The school will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.
- 8.3. The school will participate fully in Child Safeguarding Practice Reviews (CSPRs), other safeguarding reviews and file audits, as required by the Local Safeguarding Children Partnership (LSCP) and/or Children's Social Care. The school will maintain clear processes for collating and submitting evidence, will embed review recommendations into practice, and will complete all required actions within agreed timescales.
- 8.4. Where a child is subject to repeated suspensions, is at risk of permanent exclusion, is involved in a managed move or off-site direction, or is educated through alternative provision, the school will work collaboratively with parents/carers, the Local Authority and relevant agencies to ensure that safeguarding needs are identified, assessed and supported.

## **9. SAFER RECRUITMENT**

- 9.1. The school is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with pupils and staff.
- 9.2. The Local Governing Body and Leadership Team are responsible for ensuring that the school follows safe recruitment processes in line with statutory guidance.
- 9.3. The school is responsible for ensuring that the school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Local Governing Body and the school's Leadership Team.
- 9.4. The Local Governing Body will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.

- 9.5. Where relevant, settings are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006 in schools. (Applicable only to nursery, Primary and childcare for children up to the age of 8)
- 9.6. The school will ensure that contractors and providers are aware of the school's Child Protection and Safeguarding Policy and procedures, and that this will be referred to and followed in the event of an allegation being made regarding a member of their agency. The school will require that employees and volunteers provided by these organisations use the school's procedures to report concerns.
- 9.7. The school will seek assurance that employees and volunteers, provided by these organisations, and working with children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in Education. If assurance is not obtained, permission to work with children or use the school's premises may be refused.
- 9.8. When the school commissions services from other organisations, it will ensure that compliance with policy and procedures is a contractual requirement.
- 9.9. The school advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

## **10. TRAINING**

- 10.1. The school will ensure that all staff, including those who do not work directly with children, read and understand Part One of Keeping Children Safe in Education 2026 and are supported to understand their safeguarding responsibilities.
- 10.2. All staff in school are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.
- 10.3. The DSL and any Deputy DSLs undertake DSL training at least every two years and undertake regular updates in line with statutory guidance.
- 10.4. All staff receive safeguarding training appropriate to their role, regularly updated and at least annually supplemented by safeguarding updates.
- 10.5. Separate training is provided to all new staff on appointment. As part of their induction process, staff will cover online safety which includes an understanding of the expectations, in relation to filtering and monitoring and associated roles and responsibilities. This information will be regularly updated.
- 10.6. Local Governing Bodies and proprietors should ensure that all LGB members and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- 10.7. The Headteacher will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.

- 10.8. The Designated Safeguarding Lead will provide briefings to the school on any changes to safeguarding legislation and procedures and relevant learning from Safeguarding Practice Reviews (CSPRs) in line with Working Together to Safeguard Children. These will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively.
- 10.9. The school will maintain accurate and up to date records of staff induction and training.

## **11. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT**

- 11.1. While the school has a separate Whistleblowing Policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the Whistleblowing Policy and should be read in conjunction with the school policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

The headteacher is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should, in the first place, make the headteacher aware.

If your concern is about the headteacher, you should raise this with the Chair of the Local Governing Body.

If you would prefer to raise your concerns outside of the school, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). A copy of the school's Whistleblowing policy is available on the school's website.

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the headteacher and no / insufficient action has been taken, or the member of staff you have concerns about is the headteacher, then you are able to contact the Designated Officers team (LADO), whose details are outlined in the top section of this document.

If you believe that a child is being abused by individuals outside the school, you can make a referral to Children's Social Care by calling the MASH, whose details are outlined in the top section of this document.

Further guidance for staff can be accessed through: [Child abuse concerns: guide for practitioners - GOV.UK](https://www.gov.uk/guidance/child-abuse-concerns-guide-for-practitioners) and through the NSPCC website [Types of Child Abuse & How to Prevent Them | NSPCC](https://www.nspcc.org.uk/what-we-do/types-of-child-abuse/how-to-prevent-child-abuse/)

## **12. SITE SECURITY**

- 12.1. All staff members have a responsibility to ensure the buildings and grounds are safe, this includes ensuring the safety of any visitors into school.
- 12.2. The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

### **13. QUALITY ASSURANCE**

- 13.1. We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.
- 13.2. The school's senior management and the local governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.
- 13.3. Safeguarding monitoring and evaluation will include consideration of disproportionality, equality and outcomes, ensuring that practice is inclusive, anti-discriminatory and focused on impact rather than process alone.

### **14. POLICY REVIEW**

- 14.1. This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle
- 14.2. The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures
- 14.3. Additional updates to the safeguarding policy and appendix will take place when needed.
- 14.4. This policy should be read alongside the school's:
  - Behaviour Policy,
  - Suspension and Permanent Exclusion Policy,
  - Managing Allegations Against Staff, Volunteers & Organisations Using the School Premises
  - Whistleblowing Policy
  - Online Safety and ICT and Internet Acceptable Use Policy
  - EYFS Policy, Safer Eating, Safe Sleeping and Intimate Care Policy

## **APPENDIX A:**

**This section is appropriate for those schools that have an Early Years Foundation Stage**

### **Early Years Foundation Stage (EYFS)**

The school recognises its duty to safeguard and promote the welfare of children in the Early Years Foundation Stage (EYFS) in line with the Statutory Framework for the Early Years Foundation Stage, Section 3: Safeguarding and Welfare Requirements. Safeguarding in the EYFS is underpinned by a child-centred approach, recognising the vulnerability of younger children and the importance of creating a safe, nurturing, and secure environment. The Designated Safeguarding Lead (DSL) has overall responsibility for ensuring that EYFS safeguarding arrangements are implemented effectively.

### **Supervision and Ratios**

The school ensures that appropriate staff: child ratios are maintained at all times in line with statutory requirements. Children are supervised effectively at all times, including during indoor provision, outdoor learning, transitions, and off-site activities. Deployment of staff is planned to ensure children's safety and wellbeing. Risk assessments are in place to ensure the safety and suitability of all EYFS environments and practices.

See the ODST EYFS Policy for more information.

### **Intimate Care and Personal Needs**

The school ensures that all intimate care (including toileting and nappy changing) is carried out safely, respectfully, and in a way that preserves the child's dignity. Procedures are clear and followed consistently by all staff. Children are encouraged to develop independence where appropriate, and staff are trained to manage intimate care sensitively. Any safeguarding concerns arising during intimate care are recorded and reported in line with this policy.

See the ODST Intimate Care Policy for more information.

### **Use of Devices, Mobile Phones and Cameras**

The use of mobile phones and devices (such as cameras and other electronic devices with imaging and sharing capabilities) are strictly controlled within EYFS areas. Staff are not permitted to use personal mobile phones or devices in areas where children are present. Any photographs or recordings are made using school devices only and in line with school procedures and parental consent and acceptable use of ICT. Devices are stored securely when not in use.

### **Arrival and Collection Procedures**

Robust procedures are in place to ensure the safe arrival and collection of children. Children are only released to authorised adults, as identified by parents/carers. Where an unknown adult is collecting a child, identity checks are carried out. The school has clear procedures for managing late collection or situations where a child is not collected, in line with safeguarding expectations. If a child is not collected, the school follows safeguarding procedures and does not release the child to an unauthorised adult.

### **Accidents, Injuries and First Aid**

All accidents, injuries, and existing marks are recorded promptly and accurately and shared with parents/carers as appropriate. The school ensures that an appropriate number of staff with current paediatric first aid training are on site at all times in line with EYFS requirements. Any concerns about a child's injury are reported and managed in accordance with safeguarding procedures.

See ODST Health and Safety Policy

## **Health, Illness and Infection Control**

The school promotes the good health of children attending the EYFS by implementing procedures to deal with illness and prevent the spread of infection. This includes appropriate responses to children who are unwell and clear communication with parents/carers.

See ODST Health and Safety Policy, ODST Medical Needs Policy, ODST Allergy Policy

## **Safer sleeping**

Where the school provides care for children who sleep as part of the EYFS provision, it ensures that safe sleep practices are in place and followed consistently by all staff to reduce the risk of harm.

The school will:

- follow current national safer sleep guidance, including that babies are always placed on their backs to sleep, unless otherwise advised in writing by a medical professional;
- ensure that children sleep in a clear, safe sleep space with no pillows, duvets, cot bumpers, soft toys, or loose bedding;
- use appropriate bedding and sleep equipment that meets safety standards;
- maintain a comfortable room temperature and monitor children appropriately while sleeping;
- ensure sleeping children are checked regularly and that these checks are recorded where required;
- never leave sleeping children unsupervised;
- work in partnership with parents/carers to understand and, where appropriate, follow a child's established sleep routines, while ensuring these routines are consistent with safe sleep guidance;
- complete individual risk assessments where a child has specific medical or developmental needs affecting sleep;
- ensure all staff working with babies and young children are trained in safer sleep practices and understand their safeguarding responsibilities in this area.

Any concerns about a child's safety during sleep will be treated as a safeguarding matter and responded to in line with this policy.

See the ODST Safer Sleeping Policy for more information.

## **Safer eating, Nutrition, Food safety and Hygiene**

The school is committed to promoting safe eating practices in line with EYFS requirements to safeguard children and minimise the risk of choking, allergic reactions, and other harm during food consumption. We recognise that mealtimes present potential risks, particularly for younger children. We therefore implement robust procedures to ensure that all food provided and consumed within the setting is appropriate, supervised, and managed safely.

The school is committed to promoting children's health, wellbeing and development through the provision of healthy, balanced and nutritious food and drink in a safe and supportive environment.

The school comply with the Early Years Foundation Stage (EYFS) statutory framework, which requires that: "Where children are provided with meals, snacks and drinks, these must be healthy, balanced and nutritious."

We also have regard to the EYFS Nutrition Guidance (2025)

See the ODST Safer Eating Policy for more information.

## **Risk assessment**

Risk assessment procedures are in place in line with the EYFS Statutory Framework to identify, manage, and minimise risks to children across all environments, activities, equipment and care routines. All areas and resources are regularly checked to ensure they are safe and suitable, with ongoing monitoring by staff. Assessments are reviewed and updated as necessary, including in response to changes in provision or individual needs, and appropriate action is taken promptly to address identified risks, ensuring children's safety while supporting their learning and development.

Staff are supported through induction, training and ongoing supervision to understand and implement risk assessment procedures as part of their day-to-day responsibility for children's safety.

## APPENDIX B:

### The role of the Designated Safeguarding Lead

#### Managing referrals:

- Refer cases to MASH, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Refer to the Local Safeguarding Children Partnership's (LSCP) threshold of needs to assist with decision making, available from a link in the top section of this document
- Act as a source of support, advice, and expertise to staff members on matters of child protection and safeguarding, including Contextual Safeguarding.
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'\* and a point of contact for Child Exploitation. \*Guiding principles of the scheme are here <https://www.operationencompass.org/educational-settings> . An annual information letter must be sent to parents.
- To ensure that the Local Authority are notified if children are persistently absent or [missing from education](#)
- Ensuring safeguarding practice includes consideration of unborn children, contributing to pre-birth assessments, planning and multi-agency decision-making where concerns are identified during pregnancy.
- Monitor children who are subject to repeated suspensions, permanent exclusion, off-site direction, managed moves or alternative provision to ensure that any safeguarding, attendance, SEND, mental health and exploitation risks are identified, assessed and appropriately supported.

#### Record keeping:

- Keep detailed, accurate, secure written (or online) records of all safeguarding and welfare concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- Schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- When a child leaves the school, the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new school and will ensure that the safeguarding file is forwarded to the receiving school within 5 school days. The school will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.
- Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding records to the Education Social Welfare Service.
- Ensuring records evidence the child's lived experience, wishes and feelings, and demonstrate how these have informed assessment, planning and professional decision-making.

#### Multi-agency working and information sharing:

- The DSL recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- The School is not the investigating agency when there are child protection concerns. The school will, however, contribute to the investigation and assessment processes as required. The school recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

## **Training:**

The DSL will ensure all staff undertake annual updates that are appropriate to the age and stage of pupils, and the context of the school. They will consider training requirements as laid out by Keeping Children Safe in Education, and Early Years Foundation Stage safeguarding reforms. The DSL will:

- Organise face-to-face whole-school safeguarding training for all staff members at least **every three years**.
- For those with pupils 0-5 years, the DSL will ensure training is appropriate for those being cared for.
- The DSL will ensure their training remains in date (every 2 years)
- Ensure the school allocates time and resources every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Ensure there are appropriate support and additional training opportunities, so practitioners are facilitated to put training into practice.

Training will enable staff to be able to:

- Be able to understand what is meant by the term safeguarding and identify the main categories of abuse, harm and neglect.
- Be able to recognise the signs, factors, situations and actions that could lead or contribute to abuse, harm or neglect. Recognise how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- Be able to identify and respond to concerning comments or behaviours, notice changes in behaviour and know how to respond in an effective and timely manner.
- Understand the assessment process for providing early help and intervention, e.g., the Local Authority's thresholds of need, preventative education, and the local offer
- Have a working knowledge of how the Local Authority conducts initial and review child protection (CP) case conferences and contribute effectively to these
- Be aware of roles and responsibilities of professionals in relation to safeguarding
- Be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, susceptible to exploitation, radicalisation and subject to seeing, listening to or hearing domestic abuse.
- Ensure each member of staff has read and understands the school's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the school's Behaviour Policy and the school's procedures for managing children who have unexplainable and or/persistent absences from education, as well as the Staff Code of Conduct, and the Child Protection Policy, dealing with disclosures and managing allegations processes, and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring in relation to ICT.
- All staff should be aware of the key legislation, policy, codes of conduct and practice within their school which support safeguarding, and these should be explained to them as part of staff induction and when there are any changes.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.
- Maintain accurate records of induction, ongoing training, and continual professional development (CPD) relating to safeguarding.

## **Awareness raising:**

- Ensure the school's child protection policies are known, understood appropriately.
- Ensure that practitioners are supported and confident to implement the setting's safeguarding policy and procedures on an ongoing basis
- Ensure the school's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with local governing bodies regarding this.
- Ensure the safeguarding policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the school in this.
- Ensure that all staff are aware of the school's policy on ICT and have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

**Quality assurance:**

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Monitor the implementation of and compliance with policy and procedures, including periodic audits of safeguarding and welfare concerns files (at a minimum once a year).
- Complete the 157/175 (annual safeguarding report) and submit to the Local Authority
- Provide regular reports, to the Local Governing Body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in safeguarding arrangements.

**Support for staff:**

- The school will have a framework for providing an opportunity to staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the child's case.
- The DSL must provide support, advice and guidance to all practitioners on an ongoing basis, and on any specific safeguarding issue required.

## APPENDIX C:

### Safeguarding Procedures

#### Definitions:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children.
- **Children** are any people who have not yet reached their 18<sup>th</sup> birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or significant harm is suggested.
- **Early Help and Family Help** are forms of support available to children and families to improve outcomes, build resilience and prevent needs from escalating. Providing support as soon as difficulties emerge is more effective than responding later when concerns have become more complex. Early Help and Family Help may be particularly effective in addressing emerging safeguarding concerns, including non-violent harmful sexual behaviour (HSB). The Designated Safeguarding Lead (DSL) and deputy DSLs should understand local thresholds, Early Help and Family Help arrangements, and how to access appropriate support for children and families.
- **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm.
- **Safeguarding and promoting the welfare of children** is defined as:
  - providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing the impairment of children's mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
  - taking action to enable all children to have the best outcomes.
  - identifying and responding to indicators of abuse, neglect, exploitation, trafficking and modern slavery.

School staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare, and prevent concerns from escalating.

There is a bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on **0800 136 663** or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states ‘where the question of whether harm suffered by a child is significant turns on the child’s health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.’
- **Vulnerable children:** Any child may benefit from early help, including Family Help and preventative services, but all school staff should be particularly alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is frequently missing/goes missing from education, home or care,
  - has experienced suspension, multiple suspensions, off-site direction, placement in alternative provision, managed moves, or is at risk of permanent exclusion. The school recognises that repeated suspension or exclusion may be an indicator of unmet safeguarding needs, including SEND, mental health needs, child exploitation, trauma or family adversity, and will ensure appropriate assessment and support is considered
  - are persistently absent or severely absent may be at increased risk of abuse, neglect, exploitation and poor outcomes
  - is at risk of modern slavery, trafficking, criminal exploitation, sexual exploitation or forced labour, including where they may be controlled, coerced or exploited by individuals, groups or organised criminal networks.
  - is at risk of being radicalised or exploited
  - has a parent or carer in custody, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing alcohol and other drugs themselves
  - is at risk of so-called ‘honour’- based abuse such as Female Genital Mutilation or Forced Marriage
  - is a privately fostered child.
  - children who may be vulnerable due to bullying, discrimination, family conflict, poor mental health, exploitation or other safeguarding concerns relating to gender questioning
  - children educated on a reduced or part-time timetable
  - children who are repeatedly removed from lessons or classrooms

### Categories of Abuse:

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child’s emotional development and conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include:
  - not giving the child opportunities to express their views
  - deliberately silencing them or ‘making fun’ of what they say or how they communicate

It may feature:

- age or developmentally inappropriate expectations being imposed on children
- interactions that are beyond a child’s developmental capability
- overprotection and limitation of exploration and learning
- preventing the child from participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/>

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

### **Mental Health:**

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

The department has published advice and guidance [Preventing bullying - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/preventing-bullying) and [Mental Health and Behaviour in Schools](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing). Its resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](https://www.gov.uk/government/publications/every-mind-matters) for links to all materials and lesson plans.

## APPENDIX D:

### Further information

#### Children Questioning Their Gender

Children who are questioning their gender may experience a range of vulnerabilities and safeguarding risks, including bullying, prejudice, harassment, social isolation, family conflict, online abuse, poor mental health, self-harm, exploitation, or abuse. Staff should remain alert to these risks and respond in accordance with this safeguarding policy. The fact that a child is questioning their gender does not, in itself, constitute a safeguarding concern. However, where concerns arise regarding a child's welfare, safety, wellbeing, or risk of harm, appropriate safeguarding procedures must be followed.

The school will take a child-centred approach, ensuring that the wishes, feelings and lived experiences of the child are heard and considered alongside their welfare, safety and best interests. Any safeguarding decisions will be based on an individual assessment of risk and need, taking account of the child's age, understanding, vulnerabilities, family circumstances, and wider safeguarding context.

Where concerns are identified, the Designated Safeguarding Lead (DSL) will consider whether additional support, Early Help, including Family Help and preventative services, mental health support, or referral to other agencies is required. Staff should report any concerns relating to a child's welfare, wellbeing, safety, or potential risk of harm to the DSL in accordance with the school's safeguarding procedures.

The school will ensure that all children are treated with dignity, respect and fairness, and will challenge bullying, discriminatory behaviour, harassment, victimisation and abuse. Any incidents will be recorded, reviewed and responded to appropriately in line with the school's safeguarding, behaviour and equality policies.

The school will have regard to all current DfE guidance relating to gender-questioning children and safeguarding.

#### Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Female genital mutilation: resource pack - [GOV.UK \(www.gov.uk\)](https://www.gov.uk)

- **Indicators** - There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.
- **Actions** - If staff have a concern, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

- **Mandatory Reporting Duty** From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead and involve the Integrated Front Door as appropriate.

### **Fabricated or Induced Illness / Perplexing Presentation**

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history.
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- induction of illness by a variety of means.

Where this is identified and considered a risk, a referral will be made to the MASH for support and guidance. School may involve other agencies in making their assessments; for example, that could include school nurse, community paediatrician, occupational therapists.

### **Gang and Youth / Serious Violence**

Children and Young People who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence, and substance misuse.

<https://www.gov.uk/government/publications/serious-violence-strategy>

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g., knife crime).

## Weapons and Offensive articles

An offensive weapon is any article which is made, intended or adapted to cause injury, including homemade/3D printed weapons, or an item adapted for causing injury to a person.

The school recognises that the possession or carrying of weapons by children may be associated with child criminal exploitation (CCE), county lines activity, gang affiliation, coercion, intimidation or serious violence. Any concerns relating to a pupil carrying, possessing or having access to a weapon will be treated as a safeguarding concern and referred immediately to the Designated Safeguarding Lead (DSL). The school will work with parents/carers, the police, children's social care and other agencies where appropriate to assess risk and safeguard the child.

Both victims and perpetrators of serious violence may require safeguarding assessment and support.

Further details are outlined in the ODST Behaviour Policy.

## Faith Based Abuse

Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

*'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'* When this type of abuse is suspected staff will make a referral to the MASH Team for support and guidance.

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

## Modern Slavery and Human Trafficking

Modern slavery is a form of child abuse and may include human trafficking, forced labour, domestic servitude, debt bondage, criminal exploitation and sexual exploitation.

Children may be trafficked internally within the UK or internationally and may not recognise themselves as victims.

Indicators may include:

- unexplained absences from school
- frequent movement between addresses
- being accompanied by controlling adults
- evidence of criminal exploitation, including county lines activity
- signs of physical or emotional abuse
- fearfulness, anxiety or inability to speak independently
- possession of unexplained money, gifts or mobile phones

Any concerns regarding modern slavery or trafficking must be reported immediately to the DSL and may require referral to Children's Social Care, the Police and the National Referral Mechanism (NRM).

## **Risk of Trafficking**

Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

- “Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs.
- The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.
- The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in sub-paragraph (a) of this article
- “Child” shall mean any person under eighteen years of age.

Children trafficked into the country may be registered at a school for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools which are situated near ports of entry, but practitioners should be alert to this possibility in all schools. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller, or migrant families – who collectively go missing from school.

If a member of the school staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or Local Authority children’s social care are contacted immediately.

## **Risks Associated with Parent/Carer Mental Health**

The majority of parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. The school will follow the guidance outlined in ‘working with parents with mental health problems and their children (Think child, think parent, think family: a guide to parental mental health and child welfare).

Our approach is to recognise; seek support; instil preventive factors and monitor. Designated Safeguarding Lead should seek support through the Early Help/Family Help team but escalate to the MASH Team if they are concerned that the child involved is being placed at immediate risk of harm.

## **Drugs and Alcohol**

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they affect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol and built into the year 5-6 curriculum.

## Honour Based Violence and Forced Marriages

Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their 'code of honour'. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South, and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

For more information see:

<http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/>

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

## Managing Allegations against staff (including those accessing the school premises)

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. This includes allegations relating to individuals or organisations using the school premises for the purpose of running activities for children (for example community groups, sports associations or service providers that run extra-curricular-activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO. Details for the LADO can be found in the top section of this document.

As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO. Chairs of LGBs should refer to this guidance if there is an allegation against the headteacher. This includes all cases that meet the harms threshold, where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, and is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the Local Authority designated officer (LADO)

There are two levels of allegation/concern:

- allegations that may meet the harms threshold (see definition above)
- allegation/concerns that do not meet the harms threshold – referred to in 2023 guidance as 'low level concerns'

Local Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that schools have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

‘Low Level Concerns’ - Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Records of low-level concerns will be retained until the individual leaves employment and reviewed to identify patterns of concerning behaviour.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

Such concerns must always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

An Allegations and Consultation Referral Form must be completed by the Headteacher or manager in full and forwarded to the LADO via email within 24 hours. Please also refer to the ODS Policy: Dealing with Allegations Against Staff, Volunteers & Organisations Using the School Premises.

Contact details for the LADO can be found in the top section of this document.

## **Preventing Radicalisation**

Protecting children from the risk of radicalisation should be part of schools’ wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may need help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme

From 1 July 2015 all schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (‘The CTSA 2015’). Schools must have regard to statutory PREVENT GUIDANCE issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools “responsibility to the need to prevent people from being drawn into terrorism.” This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, local governing bodies and proprietors of all schools should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Board (LSCBs). Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#).

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

Contact details and further information regarding Prevent can be found in the top section of this document.

The Department for Education has also [published advice for schools on the Prevent duty](#) and is intended to complement the Prevent guidance and signposts other sources of advice and support.

## Channel

School staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the Local Authority and include the police for the relevant Local Authority area. Following a referral, the panel will assess the extent to which identified individuals are at risk of being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, and support arranged and provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here: <https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

## Children Who Are Absent from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable for their age, ability, aptitude, and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area. The school recognises that children who experience repeated suspension, exclusion, off-site direction or placement in alternative provision may become more vulnerable to safeguarding risks and will maintain oversight of their welfare, attendance and educational engagement.

When children have unexplainable and/or persistent absences from education for prolonged periods and/or on repeat occasions; this can be a vital warning sign of a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. School staff should follow the school's procedures for dealing with children who are persistently absent and children missing education, to identify such abuses as early as possible. In the case of absent pupils this helps prevent the risk of them becoming a child missing education in the future. Procedures should be followed when problems are first emerging, but also where children are already known to the Local Authority children's social care service and have a social worker (such as a child on a Child in Need or Child Protection Plan, or a Child we Care for/LAC plan). Being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve school attendance' for further guidance: <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

Schools should put in place appropriate safeguarding policies, procedures and responses for children who are identified as absent or missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and an attendance register (with the exception of schools where all pupils are boarders). All pupils must be placed on both registers. An appropriate response is needed when a child has poor attendance or is regularly missing education.

<https://www.gov.uk/government/publications/children-missing-education>

All schools must inform their Local Authority and Local Governing Body of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g., home education, have ceased to attend school and no longer live within reasonable distance of the school at which they are registered
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend school 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
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of the period
- have been permanently excluded.

The Local Authority must be notified when a school is to delete a pupil from its register under the above circumstances. Schools should contact the Admissions Team: Tel: 01865 815 175. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the Local Authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).

All of the above must also be reported to the school's Local Governing Body through means of regular reporting procedures and must include confidential and relevant information.

Contact details and additional information on the Children Missing Education Team can be found in the top section of this document.

## **Child Sexual Exploitation & Child Criminal Exploitation**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted as exploitation. As well as being physical it can be facilitated and/or take place online.

### **Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Child sexual exploitation: guide for practitioners](#)

### **Child Criminal Exploitation (CCE)**

While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled, or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation. Children may be vulnerable to financial exploitation including online scams, fraud, coercion to transfer money, money muling and financially motivated sexual exploitation.

**County Lines** is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal' lines. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence, and weapons including knives, corrosives, and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults, and local communities. Further information can be found here: [Criminal exploitation of children and vulnerable adults: county lines \(accessible version\) - GOV.UK](#)

### **Sexual harassment, violence, harmful sexual behaviours (inc. child on child abuse and 'upskirting')**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that schools are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child on child, sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges is available in the DfE's guidance *Keeping Children Safe in Education*.

It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who are questioning their gender, identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND. The school recognise that these children can be targeted by other children, so it is vital the school provide a safe space for these children to speak out and share their concerns with members of staff. Pupils are protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism, and other forms of discrimination. Staff must have familiarity with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response> ,

Child-on-child abuse includes the consensual and non-consensual sharing of self-generated intimate images and videos, including AI-generated images and deepfakes. The creation, possession, sharing or threatening use of AI-generated intimate images will be managed as a safeguarding concern and may constitute harmful sexual behaviour.

The school acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. The school also have a statutory duty to report and record any of the above incidents. Schools must record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with the setting's child protection policies. Victims of harm should be supported by the school's pastoral system and, and their wishes and feelings considered and that the law on child-on-child abuse is there to protect them, not criminalise them.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), sharing nudes and semi-nudes: advice for education settings working with children and young people <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

### **AI-generated intimate images and deepfakes**

The school recognises that technology, including artificial intelligence (AI), can be used to facilitate abuse. This includes the creation, possession, sharing or threat to share AI-generated or digitally altered intimate images and videos (sometimes referred to as deepfakes). The consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI, may constitute child-on-child abuse, harmful sexual behaviour and/or sexual harassment. Any such incident will be treated as a safeguarding concern and managed in accordance with this policy.

### **Upskirting**

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

### **Consent**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales](#)

Sexual consent:

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.

## Misogyny

Refers to prejudiced, abusive or discriminatory attitudes, language or behaviour directed towards girls or women because of their sex. In a safeguarding context, this includes conduct both online and offline that demeans, belittles, sexualises, intimidates or harms girls and women, or that normalises such behaviour through dismissal as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. Misogyny is recognised as a form of harmful behaviour that can contribute to an unsafe environment, normalise abuse and discourage reporting, and is closely linked to child-on-child abuse, sexual harassment, harmful sexual behaviour and sexual violence. The school has a zero-tolerance approach to misogyny and will challenge, record and respond to all incidents appropriately as part of its safeguarding duties.

## Digital Safety & Remote Learning

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation-technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos, including AI-generated images or deepfakes, pornography, sharing other explicit images, online bullying, and other harmful online behaviours).
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

The school will have clear expectations regarding pupil use of mobile devices during the school day and will take reasonable steps to minimise distraction, online risk and misuse. The school must have a Digital Safety policy, which covers the use of mobile phones, cameras, and other digital recording devices e.g., i-Pads. For online safety, within the policy there is support about children accessing the internet whilst they're at school using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at school, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within schools ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the school asks children to do online (e.g., sites they need to visit or who they'll be interacting with online)

## **Wearable recording devices**

The school recognises that camera-enabled wearable technologies, including smart glasses, AI-enabled glasses, body-worn cameras and similar devices, may present safeguarding, privacy and data protection risks. The use of such devices by pupils, visitors, contractors, parents/carers and other adults on site is restricted and managed in accordance with the school's ICT and Acceptable Use Policy. Any concerns regarding unauthorised recording of pupils, staff or visitors will be treated as a safeguarding concern and managed appropriately.

## **Artificial Intelligence (AI)**

The school recognises that artificial intelligence (AI), including generative AI tools, presents both opportunities and safeguarding risks. Staff and pupils should be aware of risks including exposure to harmful or inaccurate content, misinformation, online grooming, exploitation, cyberbullying, image manipulation, deepfake and AI-generated sexual imagery, privacy and data security concerns, and the misuse of AI to facilitate abuse. The school's online safety curriculum and staff training will include awareness of emerging technologies and the safe, responsible and ethical use of AI.

## **Filters and monitoring**

Local Governing Bodies and proprietors must do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, local governing bodies and proprietors ensure their school has appropriate filters and monitoring systems in place and that there is regularly review of their effectiveness. The governing body receives regular assurance reports regarding filtering and monitoring systems.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, local governing bodies and proprietors must also consider the age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards (see below link) which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs.

Local Governing Bodies and proprietors understand their responsibilities for periodically reviewing the effectiveness of these procedures and the standards, and will discuss this with IT staff and service providers, discussing what more needs to be done to support schools and colleges in meeting this standard. This includes an understanding of responsibilities to have an appropriate level of security protection, and an understanding of evolving cyber-crime technologies and e-security. The effectiveness of filtering and monitoring systems will be reviewed at least annually and whenever technology or safeguarding risks change.

Monitoring and filtering standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

Cyber security standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all their pupils to attend in person.

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

## **Pre-Appointment Checks and Safer Recruitment**

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, schools and colleges must:

- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website
- gain timely and appropriate references from suitable personnel at the employees current or most recent setting.
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- schools that work with children between 8 and 18 years old must recognise that the 'relationships and associations' that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school (Childcare Act 2006 – as amended)
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website.
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- carry out prohibition check for all staff with QTS
- complete a risk assessment for each volunteer to decide whether they need to do an enhanced DBS check or not. (Please note even if it is decided an enhanced DBS is to be requested, if the volunteer is not in regulated activity, then you're not legally allowed to do a barred list check)
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained

- all schools providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

## **Single Central Record**

Schools and colleges must keep a single central record. The single central record must cover the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school: in colleges, this means those providing education to children; and
- The information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained
- an identity check / a barred list check / an enhanced DBS check/certificate / a prohibition from teaching check
- check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State, this includes all LGB members and school Senior Leaders
- further checks on people who have lived or worked outside the UK – overseas checks/right to work
- a check of professional qualifications; and a check to establish the person's right to work in the United Kingdom.

For supply staff, schools should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

The details of an individual should be removed from the single central record once they no longer work at the school.

Local Governing Bodies are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the Local Governing Body to apply for the certificate, for any of their members, who do not already have one. Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

The SCR shall be updated in the light of any further legislation.