



## Safeguarding and Child Protection Policy

(Whole School Including EYFS)

<b>First Issued:</b>	September 2001	<b>Next Review:</b>	Summer Term 2026
<b>Last Reviewed:</b>	Autumn Term 2025	<b>Version:</b>	11
<b>Responsible:</b>	Designated Safeguarding Lead		

## **Safeguarding Statement**

At Orley Farm School, we respect and value all children and are committed to providing a caring, friendly and safe environment for all our pupils so they can learn in a relaxed and secure atmosphere. We believe every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm. This is the responsibility of every adult employed by, or invited to deliver services at, Orley Farm School. We recognise our responsibility to safeguard all who access school and promote the welfare of all our pupils by protecting them from physical, sexual and emotional abuse, neglect and bullying, and poor mental health.

This policy will be reviewed **annually**.

### **Important contacts for this policy**

<b>Role/Organisation</b>	<b>Name</b>	<b>Contact Details</b>
<b>Designated Safeguarding Lead (DSL)</b>	Matthew King	0208 869 7687 07527 912321
<b>Deputy DSL(s)</b>	Rebecca Gascoigne	07796 956607 0208 793 3233
	Melanie Gentles	0208 869 7608 07809 209417
	Henk Richards	0208 869 7609 07701 341678
<b>Named Safeguarding Governor</b>	Dr Mary Short	Contact the Schools PA – Sara Padalino – 0208 869 7606
<b>Local Authority Designated Officer (LADO)</b>	HARROW GOLDEN NUMBER:	0208 901 2690
<b>Chair of Governors</b>	Dr Mary Short	Contact the Schools PA – Sara Padalino – 0208 869 7606
<b>Channel Helpline</b>		020 7340 7264



NSPCC Whistleblowing Information – 0800 028 0285 or help@nspcc.org.uk



Copies to:- PP Entrance, PP Staff room, US Staff room, Front Office, Gardner Notice board, Kitchen Staffroom, Site room, DSL, East wing

## 1. Aims

Our school aims are to:

- Ensure all appropriate action to safeguard and promote children’s welfare is undertaken promptly
- Ensure that all staff are fully up-to-date and aware of their statutory responsibilities concerning safeguarding and child protection
- Ensure that all staff have up-to-date and comprehensive training in recognising and reporting safeguarding and child protection issues
- Ensure all staff understand their responsibility to safeguard themselves and their colleagues and are informed and trained.

## 2. Legislation and Statutory Guidance

This policy is written with due regard to the following statutory guidance:

- DfE statutory guidance last updated in July 2025 [Keeping Children Safe in Education](#)
- DfE statutory guidance last updated in June 2025 [Working Together to Safeguard Children](#)
- DfE guidance last updated in October 2020 [Governance Handbook](#)

The school complies with this guidance and the agreed arrangements published by our local safeguarding partnership.

The following legislation also applies to this policy:

- Section 175 of the [Education Act 2002](#)- placing a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#)- sets out the single central record’s contents and the requirement for training in safer recruitment techniques for at least one person on an interview panel.

- [The Children Act 1989](#) (and [2004 amendment](#))- provides the framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#)- places a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18.” (‘suspected’ is covered in wider safeguarding duties, but the mandatory reporting duty is only for known cases, not suspicions).
- [Statutory guidance on FGM](#) - sets out responsibilities concerning the safeguarding and supporting of FGM victims.
- [The Rehabilitation of Offenders Act 1974](#)- sets out when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)- defines ‘regulated activity’ about children
- [Statutory guidance on the Prevent duty](#)- explains schools’ duties to protect people at risk of radicalisation and extremism under the Counter-Terrorism and Security Act 2015
- [The Equality Act 2010](#) clarifies that it is unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- [The Public Sector Equality Duty \(PSED\)](#)- the need to have due regard to eliminating unlawful discrimination, harassment and victimisation.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#)- sets out who is disqualified from working with children
- [Online Safety Act - GOV.UK](#)– references schools’ duties regarding harmful online content and digital literacy
- [Education and Inspections Act 2006](#)– includes the duty to promote the safety and well-being of pupils and powers relating to behaviour.
- [Human Rights Act 1998](#)– underpinning right to life, privacy, and protection from degrading treatment.
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

### **3. Statement for Equality of Access**

- a. The school recognises an increased risk of abuse for some children and additional barriers for others regarding recognising or disclosing abuse. Therefore, the school is committed to identifying children’s diverse circumstances and giving them the same protection, regardless of any barriers they may face.
- b. In response to the above, the school will pay particular attention to children who have the following:
  - SEND or health conditions, including suspected or known mental health conditions (see the Pupils with special educational needs, disabilities or health issues section)
  - Young carer responsibilities
  - Protected characteristics and may face discrimination due to their race, ethnicity, religion, gender identification or sexuality
  - English as an additional language or are new to English (including BSL)
  - Difficult home situations
  - Increased risk of forced marriage, radicalisation, FGM or sexual exploitation
  - Asylum status

- Increased risk due to mental health needs, either their own or a family member
- Looked after or previously looked after status (see the Looked-after or previously looked-after children section)
- Been missing from education
- Possible risks related to home-education
- Increased risk of becoming involved in anti-social or criminal behaviour, including gangs, county lines or other contextual safeguarding situations
- Increased risk of trafficking, modern slavery or sexual or criminal exploitation
- A family member who is known to be an offender or is in prison currently
- **The Definition of Safeguarding**

The definition of safeguarding in paragraph 3 of KCSIE has been updated to align with Working Together to Safeguard Children to emphasise the importance of early intervention, protection from harm (both online and offline), and promoting the best outcomes for all children:

*‘No single practitioner can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action’.*

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;*
- *taking action to enable all children to have the best outcomes.*

#### **4. Roles and Responsibilities**

This policy applies to all staff, volunteers and governors in the school, as safeguarding is everyone’s responsibility.

This policy and procedures apply to off-site and extended school activities, including visitors and contractors.

##### **a. Roles and Responsibilities of all Staff**

All staff will:

- Read and understand *Keeping Children Safe in Education* (Part 1 and Annex B) annually, and whenever updated, confirming their understanding through the school’s annual declaration process.
- Follow all school safeguarding policies and procedures, including:
  - Safeguarding and Child Protection Policy
  - Staff Code of Conduct / Behaviour Policy
  - Behaviour Policy

- Online Safety Policy
- Critical Incident Protocols
- Procedures for children missing from education
- Know the identity and role of the Designated Safeguarding Lead (DSL), Deputy DSLs (DDSLs), and Designated Mental Health Lead (DMHL).
- Maintain awareness of and follow HM Government guidance on *Searching, Screening and Confiscation*.

iii. In their safeguarding practice, all staff must:

- Identify children who may need help or protection and act immediately, following school procedures.
- Understand the early help process and their role in identifying emerging needs, liaising with the DSL, and sharing relevant information with other professionals.
- Know how to make a referral to local authority children's social care and their role in any subsequent statutory assessments.
- Recognise the signs of abuse and neglect, including specific safeguarding issues such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), serious violence indicators (including county lines), FGM, radicalisation, domestic abuse, and trafficking.
- Maintain confidentiality in all safeguarding matters and know how to respond appropriately to a disclosure.
- Provide a safe, supportive environment for all pupils, including LGBTQ+ pupils and those with protected characteristics, enabling them to speak out without fear of prejudice or discrimination.
- Support parental understanding of safeguarding, including raising awareness of online safety and safe use of school-provided digital resources.
- Reassure victims that they will be taken seriously, kept safe, and supported appropriately.
- Understand that safeguarding risks can occur anywhere — at school, online, at home, and in the wider community — and respond accordingly.
- Challenge poor safeguarding practice and know how to raise concerns through the school's whistleblowing procedures.
- All staff will be made aware of and are required to adhere to the HM Government guidance: [Searching, screening and confiscation in schools - GOV.UK](#).

b. Role and Responsibilities of the Designated Safeguarding Lead (DSL)

- The DSL in the school is Matthew King, Deputy Head Pastoral. They are a member of the Senior Leadership Team (SLT). The DSL is responsible for child protection and wider safeguarding in the school.
- The DSL is available during school hours for staff to discuss safeguarding concerns.
- Outside school hours the DSL can be reached on the school mobile number 07527 912321 and [kingm@orleyfarm.harrow.sch.uk](mailto:kingm@orleyfarm.harrow.sch.uk).
- The Deputy DSL/s are:
  - Rebecca Gascoigne (Head of Drama)
  - Melanie Gentles (Head of Middle School)
  - Henk Richards (Head of Pre-Prep)

They will act as cover in the absence or unavailability of the DSL.

If the DSL and DDSL(s) are unavailable, Tim Calvey (Head Teacher) will act as cover.

**Core responsibilities** (in line with current Department for Education statutory guidance on safeguarding):

1. Case Management

- Take lead responsibility for safeguarding and child protection across the school.
- Make referrals to local authority children’s social care, the Channel programme, the police, the Disclosure and Barring Service (DBS), and other relevant agencies, and support staff to make referrals directly where appropriate.
- Attend and contribute to strategy meetings, case conferences, core groups, and other inter-agency meetings.
- Maintain accurate, detailed, and secure child protection records and ensure their transfer when a pupil leaves.

2. Policy, Training, and Awareness

- Ensure all staff are aware of safeguarding policies, procedures, and their responsibilities.
- Lead on the induction and ongoing safeguarding training of all staff, in accordance with current statutory guidance.
- Work with the governing body to ensure the safeguarding policy is reviewed annually, and that procedures remain in line with national and local requirements.

3. Partnership Working

- Liaise with the headteacher on safeguarding matters.
- Work collaboratively with local authority case managers, social workers, police, and other safeguarding partners.
- Be aware of local specialist support for children affected by sexual violence and sexual harassment, both victims and alleged perpetrators.
- Understand the role of the ‘appropriate adult’ in police processes and ensure this is provided when needed.

4. Risk Management and Technical Safeguarding

- Understand safeguarding risks including harmful sexual behaviour, child-on-child abuse, exploitation, radicalisation, domestic abuse, and other contextual safeguarding concerns.
- Work with IT staff and providers to ensure effective filtering, monitoring, and data security, in line with DfE standards.
- Oversee safeguarding aspects of the single central record (SCR) and safer recruitment processes.

5. Support and Resources

- Ensure sufficient time, funding, training, and resources are available to fulfil the role effectively.
- Support and advise staff on safeguarding concerns, ensuring children receive appropriate help as quickly as possible.

Supervision and Support

- i. Supervision is the opportunity to talk through and reflect upon daily practice. A DSL needs to receive this to alleviate the emotional impact when dealing with safeguarding concerns.

- ii. The DSL receives supervision from their line manager as part of the DSL role. Our school's 'line manager' is Tim Calvey (Headteacher). As we have a team consisting of the DSL and DDSL (s), known as the PSG (Pastoral Safeguarding Group) we run group supervision sessions together.



- iii. Supervision sessions include:

- Pupil reviews
- Discussion of any issues in the workplace or practices
- Identification and celebration of achievements
- Discussion about well-being and work-life balance
- Supportive and constructive challenge

The DSL must seek help immediately if they feel unsafe or are struggling to cope.

c. Role and Responsibilities of Governance

- i. It is the responsibility of the Governing Board, as set out in KCSIE, to ensure that all governors receive safeguarding and child protection training, in person or online. Governors need this knowledge to make strategic challenges when testing that the school's safeguarding policies, and to ensure that procedures are effective, fit for purpose and deliver a robust whole-school approach to safeguarding. Governor training is updated every year.
- ii. The Governing Board will:
- Ensure that the school's child protection and safeguarding approach is central to the organisation's operations and effectively underpinned by robust procedures and policies
  - Ensure this policy is regularly evaluated, reviewed and approved; complies with all relevant law and statutory guidance, and holds the headteacher accountable for its effective implementation

- Ensure they understand their obligations under the Equality Act 2010 (including the Public Sector Equality Duty), the Human Rights Act 1998, as well as the local multi-agency safeguarding arrangements
- Ensure the effectiveness of this policy is monitored by the appointment of the named governor, Dr Mary Short, who will report back to the full governing board
- Ensure:
  - The DSL has the appropriate status; the authority to carry out their role; and the allocation of additional time, funding, training, resources and support
  - There is a whole-school approach to online safety that is linked to safeguarding and related policies
  - IT filtering and monitoring are in place and are well managed, with effective procedures to escalate concerns that are understood by the leadership team and relevant staff
  - Procedures are in place to manage safeguarding concerns or allegations concerning staff members, volunteers, supply staff or contractors. **Appendix 3** of this policy covers this procedure
  - Children with SEND, medical or physical health conditions or any other children who are more vulnerable to abuse due to their additional barriers/needs are reflected in any policy and procedures
- Ensure that any services or activities being delivered by a third party satisfy the following criteria:
  - Assurance is sought that the third party has been appropriately trained in safeguarding and child protection and has policies/procedures in place, inspecting them where necessary
  - That, where appropriate, arrangements are in place for the third party and the school to liaise about safeguarding arrangements
  - All safeguarding requirements are in place for using the school premises, and if the third body fails to comply, their agreement will be terminated.
- If an allegation of abuse is made against the headteacher, the chair of governors will act as the 'case manager'. (See [Appendix 3](#)).
- All governors must read Keeping Children Safe in Education in its entirety.

d. Role and Responsibilities of the Headteacher

In addition to the responsibility for implementing this policy, the headteacher is also responsible for:

- Ensuring all permanent and temporary staff and volunteers:
  - Receive induction which includes information on the school's systems that support safeguarding, and this policy
  - Have a clear understanding of and can follow the procedures in this policy, most particularly those associated with referrals of suspected abuse and neglect cases
- Ensuring this policy is effectively communicated to parents/carers via the school website as well as when their child first starts at the school
- Ensuring that the DSL has appropriate time, funding, training and resources, and adequate cover is in place in the absence of the DSL
- Ensuring that all staff receive regular, appropriate and up-to-date child protection and safeguarding training
- Ensuring they act as the 'case manager' when an allegation of abuse is made against a member of staff or volunteer, where appropriate (see Appendix 3)

- Ensuring decisions are made regarding all low-level concerns in collaboration with the DSL
- Carrying out duties related to data management, particularly those specified within the DFE filtering and monitoring requirements
- Ensuring all statutory staffing ratios are met
- Ensuring the assignment of a key person for each child in the Early Years Foundation Stage

e. Role and Responsibilities of the Director of Operations

The Director of Operations is responsible for:

- Working in conjunction with the Pastoral Safeguarding Group to provide Child Protection Training for non-teaching school employees.
- Ensuring safe recruitment and employment of staff, temporary staff and volunteers who work with children. A copy of the recruitment procedure is available on the website.

f. Role and Responsibilities of the School Nurse/Welfare Officer

As well as participating fully in the proceedings of the Pastoral Safeguarding Group (PSG) their role is to ensure that relevant information that they collate, as well as information that they obtain in the course of their duties, is communicated to the Designated Teachers concerned. Types of injuries, attendance and frequency are recorded to observe patterns.

g. Role and Responsibilities of the SENDCo

- The SENDCo plays a full and active role in the Safeguarding of children at Orley Farm.
- Joint working gives another point of view for the difficulties and challenges that are part of both the SENDCo and DSL roles and enables the school to build a wider picture of children's holistic needs.
- The SENDCo should be informed of all safeguarding concerns about children with SEND, including ensuring the SENDCo receives alerts for all children on the SEND register.
- The SENDCo forms part of the Pastoral Safeguarding Group and Welfare Group which meets once each half term.

h. Role and Responsibilities of the Designated Mental Health Lead

- The Designated Mental Health Lead (DMHL) oversees the whole-school approach to wellbeing, developing a positive mental health culture that values mental health in the same way as physical health, encouraging everyone to care for their mental health and that of others. Mental health problems can indicate abuse, neglect, or exploitation; the DMHL equips staff with the knowledge and confidence to understand and recognise signs of poor mental health in pupils and know where to go with any concerns.
- The DMHL will review and implement, where appropriate, the latest positive mental health and wellbeing knowledge, training, and approaches. They are the vital link between the school, families, and the broader education and healthcare system.

## 5. Confidentiality

- Our school's approach to confidentiality will be guided by the following:

- For safeguarding to be effective, information sharing must be prompt and accurate
- The sharing of information to keep children safe supersedes The Data Protection Act (DPA) 2018 and UK GDPR and therefore sharing is permissible
- Where 'special category personal data' needs to be shared, the DPA 2018 allows staff to share information without consent only if it is not possible to gain consent or it cannot be reasonably expected that a member of staff gains consent or if by gaining consent would put a child at risk. This processing condition is named as 'safeguarding of children and individuals at risk'
- Staff must never promise children to keep secrets upon a disclosure, as this may not be in the child's best interests
- Where a victim of sexual violence or sexual harassment requests that the school does not tell anyone about it:
  - Staff may still lawfully share information if there's another legal basis under the UK GDPR that applies even if a victim doesn't consent to share information
  - The DSL must balance their duty to protect the victim and other children against the victim's wishes
  - The DSL must balance the duty to protect the victim and other children against the victim's wishes.
  - Parents/carers will usually be informed unless this puts the victim at further risk.
  - The basic safeguarding principle applies: if a child is at risk of harm, in immediate danger, or has been harmed, a referral must be made to local authority children's social care.
  - Rape, sexual assault, and assault by penetration are criminal offences. Where a report of this nature is made, the police must be informed — even if the alleged perpetrator is below the age of criminal responsibility (10 years old)

Regarding anonymity, all staff will:

- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, have a general awareness of anonymity, witness support and the criminal process
- Protect the anonymity of any children involved in any report of sexual violence or sexual harassment as far as they reasonably can
- Be aware of any potential social media impact which may expose a victim's identity and spread rumours
- Use the 7 'golden rules' from the government's [information-sharing](#) to support them in making decisions about information sharing
- Speak to the DSL or DDSs if they are in any doubt about sharing information

## 6. Recognising Abuse and Taking Action

In the event of a safeguarding issue, all staff, governors and volunteers must follow the following procedures.

- a. Where a child is suffering or may suffer harm or is in immediate danger
  - i. If a child is believed to be in immediate danger, suffering, or maybe suffering from harm, then an **immediate** referral must be made to children's social care and/or the police. Anyone can make a referral.

- ii. Where a referral has been made directly, the DSL (or DDSLs) must be told as soon as possible. (See section [The Designated Safeguarding Lead](#) and <https://www.gov.uk/report-child-abuse-to-local-council>)
- b. Where a child makes a disclosure
- i. Action to take upon a disclosure from a child:
    - Give them time to talk by listening, believing, and not asking leading questions
    - Remain calm and do not show any upset or shock
    - Acknowledge that by telling you, they have done the right thing
    - Do not promise to keep it a secret; clearly explain that you will have to pass this information on and what will happen next
    - Record in writing verbatim as soon as reasonably possible, non-judgementally and facts only. Sign and date on the schools R.O.C (Record of Concern) form - [LINK](#)
    - Give a written and digital record to DSL or, where appropriate or necessary, make a referral to children's social care and/or the police directly, informing the DSL as soon as possible that you have done so. Apart from the DSL or relevant authorities, keep all details confidential unless told to do otherwise by a relevant authority involved in the safeguarding process
  - ii. It is important to note that children:
    - May not know how or feel ready to tell anyone about their abuse, neglect or exploitation
    - May not know or recognise that their experiences are harmful
    - May feel humiliated, embarrassed or threatened due to their disability, language barriers, sexual orientation or other vulnerabilities

If you have any concerns about a child, talk to the DSL.

- c. On discovery that FGM has taken place or there is a risk of FGM
- i. Keeping Children Safe in Education defines FGM as “all procedures involving partial or total removal of the external female genitalia, or other injuries to the female genital organs”.
  - ii. Also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’, FGM is illegal in the UK, a form of child abuse with long-lasting, harmful consequences.
  - iii. See Appendix 4 for possible indicators that a pupil has already been subjected to FGM and factors that indicate a pupil may be at risk.
  - iv. Known cases (mandatory duty)

Under section 5B of the Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015), where a teacher in England or Wales:

Is informed by a girl under 18 that she has had FGM carried out on her; or

Observes physical signs which appear to show that FGM has been carried out on a girl under 18, and has no reason to believe it was necessary for her physical or mental health, or for purposes connected with labour or birth, they **must** report it personally to the police via 101 (or 999 if there is immediate risk) as soon as possible. This is a **statutory and mandatory duty**. Failure to meet it may result in disciplinary action.

The case should also be discussed with the DSL, and children's social care should be involved, unless there is a specific instruction not to share the information.

v. At risk or suspected cases

Where FGM is suspected or a girl is at risk — but it is not known to have been carried out — the mandatory reporting duty does not apply. In these cases:

- All staff must speak to the DSL immediately.
- The DSL will follow local safeguarding procedures and decide on referral to children's social care.

Important:

- Staff must never physically examine a pupil.
- All staff should familiarise themselves with the *Multi-agency statutory guidance on female genital mutilation* (HM Government, updated 2023).
- **NB – Orley Farm School sits between several boroughs. Care should be taken to contact the correct team (home address not school address) for advice and guidance.**

Where there are concerns about a child (other than suffering or likely to suffer from harm or is in immediate danger):

- Follow the procedure in Figure 1 where there are concerns about a child's welfare.
- Speak to the DSL to agree on a course of action.
- If the DSL or DDSLs are not available, there should be no delay in taking appropriate action. This includes:
  - Talking to a senior leader
  - Taking advice from the local authority on children's social care
  - Sharing the details of any actions taken with the DSL as soon as possible
  - Making a referral to local authority children's social care directly, if appropriate, sharing any action taken with the DSL as soon as possible
  - Advice is also available by contacting the NSPCC helpline on 0808 800 5000

d. Early help assessment

- i. Where appropriate, a referral for an early help assessment can be made. The DSL will usually lead on this; however, there may be a requirement for other staff to support other agencies and professionals in an early help assessment, acting as the lead practitioner in some cases.
- ii. As part of local arrangements, the school will discuss and agree on the levels for the different types of assessment with our statutory safeguarding partners.
- iii. Each case will be under constant review by the DSL; if the situation is not improving or is escalating, the school will consider a referral to local authority children's social care. All intervention timelines will be monitored and reviewed.
- iv. Whilst recognising that any child may benefit from early help, the guidance directs all school and college staff to be particularly alert to the potential need for early help for a child who:
  - 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 multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- 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;
- is disabled or has certain health conditions and has specific additional needs.

e. Referral

- Where there is a need to refer the case to local authority children's social care or the police, the DSL will usually make the referral or support you to do so.
- Where this is not possible and a direct referral is made, the DSL must be informed immediately.
- The local authority must decide within 1 working day of a referral about what course of action to take. They must inform the referrer of the outcome. If this information has not been received, there must be a prompt follow-up with the local authority by the DSL or referrer to ensure outcomes are properly recorded.
- Following a referral, if there does not seem to be an improvement in the child's situation, then the DSL or referrer must follow local escalation procedures, ensuring concerns and an improvement in the child's situation have been addressed.

f. Where there are concerns about extremism

- Where there are concerns that a child may be vulnerable to radicalisation or extremism, but is not in immediate danger or at risk of significant harm, staff should speak to the DSL without delay to agree a course of action.
- If the DSL or DDSLs are not available, there should be no delay in taking appropriate action. This may include:
  - Talking to a senior leader
  - Taking advice from the local authority e.g. Prevent / Channel Lead
  - Sharing the details of any actions taken with the DSL as soon as possible
  - Making a referral to local authority children's social care directly, if appropriate, sharing any action taken with the DSL as soon as possible
  - The DSL will consider the level of risk. They will decide as to which agency a referral should be made. This may include:
    - Local authority children's social care team
    - The [Channel programme](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism

- Seeking advice from the DfE dedicated helpline 020 7340 7264
- Emailing [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). (N.B. not for use in emergencies).

The situation would be classed as an emergency if:

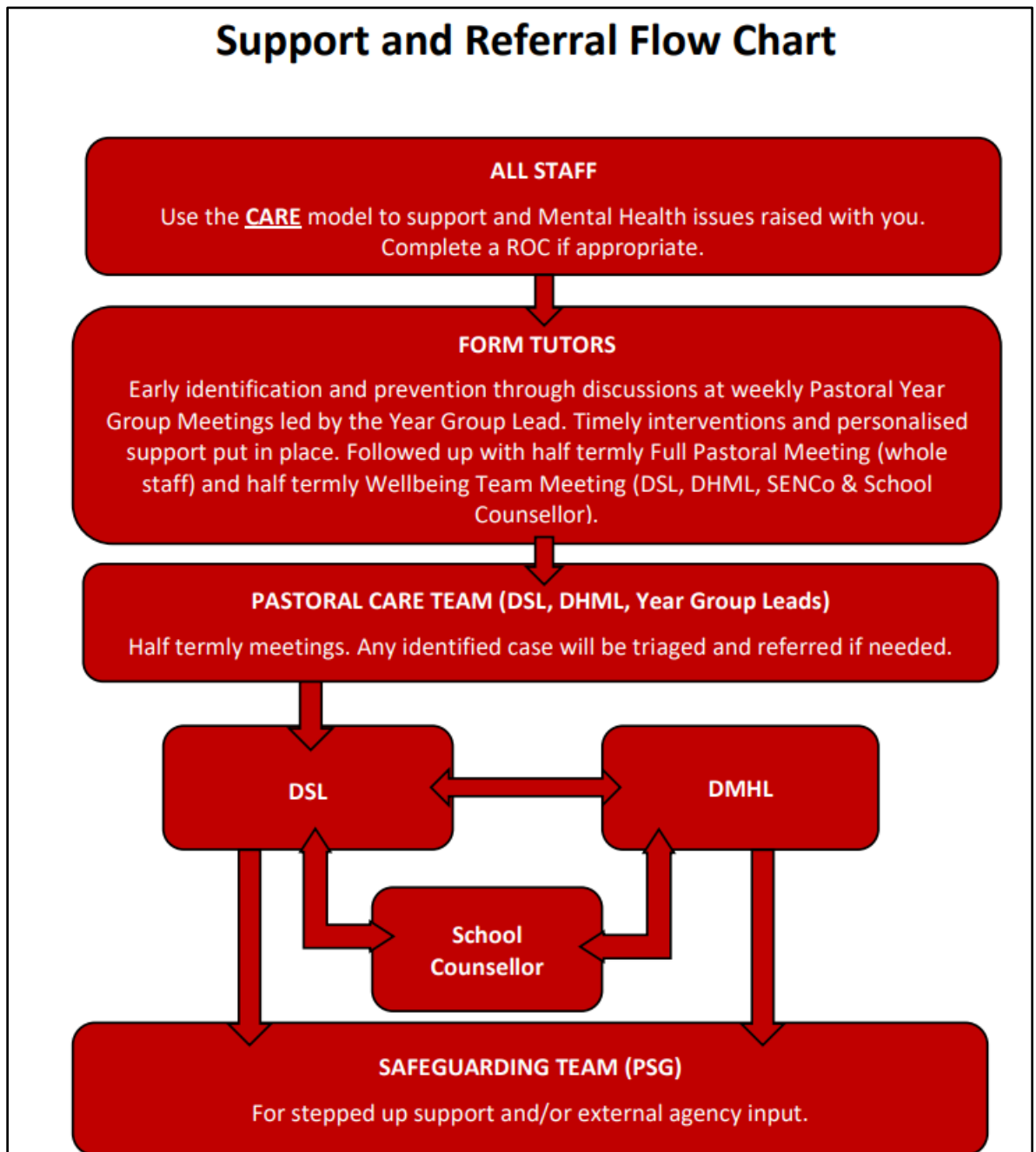
- Someone is in immediate danger
- Someone may be planning to travel to join an extremist group
- Something is seen or heard that may be terrorist-related

In these cases, call 999 or the confidential anti-terrorist hotline on 0800 789 321

g. Where there is a mental health concern

- i. Mental health problems can indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation in some cases.
- ii. Any behavioural signs or changes suggesting a child may be experiencing a mental health problem or be at risk of developing one should alert staff to consider action.
- iii. Immediate action should be taken if there is a mental health concern about a child that is also a safeguarding concern. This action should include input from a DSL and the DMHL.
- iv. At Orley Farm School, we follow the [DfE guidance on Mental Health and Behaviour in Schools](#) by ensuring early identification, prevention and timely intervention for pupils who may be experiencing difficulties. Staff are trained to use the CARE model to notice and respond to concerns, raising issues with the appropriate pastoral teams and completing a ROC form if needed. Form Tutors play a central role in monitoring wellbeing through weekly Year Group meetings, where concerns can be addressed early and personalised support plans put in place. Escalation routes are clearly defined: concerns can be referred to the Pastoral Care Team (DSL, DMHL, and Year Group Leads), who meet half-termly to triage and decide next steps. The Designated Mental Health Lead (DMHL), alongside the DSL, ensures that safeguarding pupils' emotional wellbeing is prioritised, coordinating with the school counsellor and specialist services as required. Where deeper support is needed, cases are referred to the School Counsellor or escalated to the Safeguarding Team (PSG) for stepped-up support and/or external agency involvement. Accountability is shared across all staff, with clear referral pathways and regular whole-staff and wellbeing team meetings to ensure consistent follow-up and safeguarding of pupils' mental health.

## Support and Referral Flow Chart



- h. Concerns about a member of staff (including supply teacher, volunteer or contractor)
- Staff should speak to the headteacher as soon as possible regarding any concerns about a staff member (including a supply teacher, volunteer or contractor) or if an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) who may pose a risk of harm to children. Where the concern or allegation concerns the Headteacher, the Chair of Governors must be spoken to.
  - See Appendix 3 for the procedure the Headteacher/Chair of Governors will follow.
  - Where there is deemed to be a conflict of interest in reporting a concern or allegation about a staff member (including a supply teacher, volunteer or contractor) to the Headteacher, concerns should be reported directly to the Local Authority Designated Officer (LADO).

i. Allegations of abuse made against other pupils (child-on-child)

- i. The school recognises that children can abuse their peers. Such abuse will never be tolerated. All child-on-child abuse is unacceptable and is taken seriously.
- ii. The school's Behaviour policy will deal with most cases where pupils hurt others. However, where allegations of a safeguarding concern are raised, this Child Protection and Safeguarding policy will apply, such as alleged behaviour that is:
  - Potentially a criminal offence and/or serious
  - A risk to pupils in the school
  - Violent
  - Involving pupils being forced or incited to use drugs or alcohol
  - Involving sexual abuse, exploitation or harassment (indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- iii. For more information about child-on-child abuse, see [Appendix 4](#).

j. Child-on-child abuse procedures

Where an allegation of abuse is made against another pupil, the following action will be taken:

- Staff will inform the DSL, or their deputy, immediately and record the allegation. It is not the duty of staff to investigate
- The DSL will contact the local authority children's social care team, and their advice will be followed
- Where a potential criminal offence has been alleged, the DSL will contact the police
- A risk assessment and support plan will be put in place by the DSL for all children involved (victim, perpetrator, and any others affected) with a named person they can talk to if needed
- Where appropriate, the DMHL will be informed, and Children and Adolescent Mental Health Services (CAMHS) will be contacted
- All information will be treated confidentially and only shared with those who need to know to protect the children involved.

k. Minimising the risk of child-on-child abuse

- i. The school recognises the need to create a supportive school environment and gives victims the confidence to report any child-on-child abuse incidents.
- ii. Our school will proactively achieve this by:
  - Educating pupils about appropriate behaviour and consent through our curriculum design and implementation
  - Having a reporting system which enables pupils to report abuse easily and confidently (See [pupil's](#) section below)

- Challenging language or inappropriate behaviour between peers which is derogatory or sexualised, including the sending or requesting of sexual images
- Being vigilant to any issues particularly affected by different genders, such as touching or grabbing pupils in sexualised or aggressive ways or homophobic language directed at pupils
- Reassuring pupils that their experiences and reports are being taken seriously by staff
- Carefully monitoring and reviewing all reports of sexual harassment and /or violence, ensuring policies, procedures, and the curriculum are fit for purpose and are achieving the effect intended
- Ensuring all child victims, alleged perpetrators or witnesses of sexual violence, especially rape or assault by penetration, are supported and not bullied or harassed
- Considering any support needed for siblings or other family members, where necessary, following a report of sexual violence and/or harassment
- Staff Training. All staff will:
  - Recognise the indicators and signs of child-on-child abuse, including online abuse.
  - Understand that child-on-child abuse can happen in any school, even if there have been no previous reports.
  - Act immediately if they have any concerns, including making a direct report where necessary.
  - Be aware of additional barriers for some children in disclosing abuse due to disability, gender, ethnicity, sexual orientation, or other vulnerabilities.
  - Understand that the harming of another pupil may indicate that the perpetrator is also a victim of abuse.
  - Recognise the role of social media in the escalation or aftermath of incidents.
  - Speak to the DSL if they have any concerns.
- Disciplinary Action
  - The school will provide support at the same time as taking any disciplinary action.
  - The school can take disciplinary action whilst other investigations are going on, e.g., by the police.
  - The school will consider each on a case-by-case basis and take into account whether:
    - Any action taken would prejudice an investigation and/or subsequent prosecution, determining this by liaising with the police and/or local authority children’s social care
    - The circumstances render it unreasonable or irrational for the school to conclude what happened whilst there is an ongoing independent investigation

I. Sharing of nudes and semi-nudes ('sexting')

- i. The following approach is based on HM Government advice  
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> for all staff including DSLs and senior leaders.
- ii. Responsibilities when responding to an incident

If staff are aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (aka 'sexting' or 'youth produced sexual imagery'), they must immediately report it to the DSL. Staff should:

- **Never** view, copy, print, share, store or save the imagery or ask a child to share or download it – this is illegal. If they have already unintentionally viewed the imagery by accident, they must report this to the DSL and seek support.
- **Not** delete the imagery or ask the pupil to delete it
- **Not** ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- **Not** share information about the incident with other members of staff, the pupil(s) it involves, or their or other parents and/or carers
- **Not** say or do anything to blame or shame any young people involved
- Explain the need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

iii. Initial review meeting

Following a report, an initial review meeting will take place led by the DSL. This may include the reporting staff member, the safeguarding or leadership team that deals with safeguarding concerns and other staff where deemed appropriate.

At this meeting, the situation will be considered to determine the following:

- The immediate risk to pupil(s)
- Whether a referral to the police and/or children's social care needs to be made
- Whether to contact parents/ carers of involved pupils (parents/carers will be involved unless this is deemed likely to escalate risk)
- If it is necessary to view the image(s)/ video(s) (Content should not be viewed in most cases and only viewed if deemed necessary to safeguard the pupil)
- Any further information required to help decide on the best response
- The extent of any sharing of the image(s) and where (this may be unknown)
- If any immediate action is required, should remove or delete images or videos from any online services or devices
- Relevant facts about involved pupils that could influence the risk assessment
- Any need to contact other schools, settings or individuals

A mandatory referral will be made to children's social care and/or the police by the DSL if:

- An adult is involved in the incident
- It is believed that the pupil may have been blackmailed, groomed or coerced, or there is a concern about their capacity to consent (e.g., their special educational needs)
- The content of the images or videos depicts sexual acts which are violent or unusual for the young person's developmental stage
- The images or videos involve sexual acts of any pupil under 13

- There is reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (e.g. the pupil is at risk of suicide or self-harming)

Where the review group decide not to involve children's social care or the police their decision and the rationale for it will be made and recorded in line with the procedures set out in this policy. In this situation, a further review will be undertaken by the DSL, to further establish facts and assess risks. Interviews with the pupils involved (where appropriate) will be held.

During this process, if a concern indicates that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

iv. Referring to the Police

Where a referral needs to be made to the police, this will be done through police community support officer or dialling 101.

In line with PACE (Police and Criminal Evidence Act 1984), an 'appropriate adult' (AA) must be present where the suspect<sup>1</sup> is a child or vulnerable person.

The appropriate adult's role is to ensure that children and vulnerable people suspected of a criminal offence are treated fairly and justly and can participate effectively whilst safeguarding their interests, rights, entitlements and welfare.

The Police and Criminal Evidence Act 1984, Code C, paragraph 1.7A states that "the appropriate adult is expected, amongst other things, to:

- Support, advise and assist them when, following this Code or any other Code of Practice, they are given or asked to provide information or participate in any procedure
- Observe whether the police are acting properly and fairly to respect their rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not
- Assist them in communicating with the police whilst respecting their right to say nothing unless they want to, as set out in terms of the caution
- Help them understand their rights and ensure they are protected and respected"

In English law, an appropriate adult is a parent, guardian or social worker; or if no person matching this is available, any responsible person over 18. People who can act as appropriate adults include:

- Parents or other family members
- Friends or carers
- Social workers
- Charity workers
- Appropriate specialist adults (either paid or voluntary), including DSLs

In the case of children, the police will usually ask the AA to be a parent or guardian.

v. Recording Incidents

All incidents regarding the sharing of nudes and semi-nudes and the decisions made in responding to them must be recorded in line with the [Record Keeping](#) section of this policy.

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<sup>1</sup> In this instance the term 'suspect' is used in line with PACE terminology.

vi. Curriculum Coverage

The issues surrounding sharing nudes and semi-nudes are taught to pupils as part of our relationship's education/relationships and sex education. Our school covers teaching the following about the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to come across
- When it is and is not abusive when requesting, forwarding or providing such images, and when it may be deemed as online sexual harassment and the consequences of such action
- The legality of such issues
- The risk of damage to the reputation and feelings of victims

Pupils are taught the strategies and skills needed to manage:

- The pressure to provide or forward such images and specific requests
- Receiving such images

To ensure pupils are aware of the processes the school will follow in the event of an incident, this policy on sharing nudes and semi-nudes is also shared with them.

vii. Reporting Systems for our Pupils

The school will consider the child's feelings and wishes when there is a safeguarding concern and when determining what action to take and what services to provide.

Our school recognises how important it is to ensure pupils feel safe and comfortable in coming forward to report any concerns and/or allegations.

Therefore, to achieve this, our school will:

- Ensure pupils can confidently report abuse by putting appropriate systems in place
- Ensure our reporting systems are easily accessible for pupils, easily understood and promoted well to all
- Ensure all concerns are taken seriously and pupils can safely express their views and give feedback
- Pupils are taught about the Orley Farm Umbrella and 'Who They Can Turn to on a Rainy Day'. This content is delivered through PSHE lessons, assemblies and visits from the Deputy Head Pastoral to Pre-Prep PSHE lessons
- Pupils' understanding of who they can speak to is monitored through the student survey which is conducted yearly throughout the school



**7. Online Safety and the Use of Mobile Technology**

- a. Our school recognises that safeguarding children from potentially harmful and inappropriate online material is of high-importance and that technology is often a significant element in many issues regarding safeguarding and wellbeing.

Therefore, our school aims to address this by:

- Ensuring robust processes are in place to protect the online safety of pupils, staff, governors and volunteers
- Ensuring the safe and responsible use of technology by protecting and educating the whole school community
- Ensuring the whole school community have clear guidelines for the use of mobile phones and other digital equipment
- Ensuring there are transparent mechanisms in place-for the identification, intervention and escalation of any incidents or concerns, where appropriate

**b. The key four risk categories**

Our school will use the following categories of risk to address online safety as stated in KCSIE:

**Content:** being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**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:** personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams

**c. To address these risks, our school will:**

- Ensure pupils are educated about online safety as part of the curriculum, including:
  - How to safely use social media, the internet and technology
  - How to keep personal information private
  - How to recognise unacceptable online behaviour
  - How to report cyber-bullying incidents, encouraging pupils to do so, even if they are a witness rather than a victim
- Ensure staff are trained during induction on online safeguarding issues, including cyber-bullying, safe internet use and the risks associated with online radicalisation. Refresher training will be received by all staff at least once every academic year
- Ensure parents/carers are educated about online safety through regular communications from the school, at parent consultation events and via the school website, including the procedures they need to know to raise any concerns about online safety
- Ensure all staff understand restrictions or protocols with regards to the use of their mobile phone and cameras, e.g.:
  - Use of personal mobile phones is restricted to non-contact time when pupils are not present
  - No pictures or recordings of pupils can be made on personal phones or cameras
- Ensure all pupils, parents/carers, staff, governors and volunteers sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Ensure there are clearly explained sanctions in place that will be enforced if a pupil is in breach of our policies on the acceptable use of the Internet and mobile phones
- Ensure all staff, pupils and parents/carers know that staff have the power to search pupils' phones (See [DfE's guidance on searching, screening and confiscation](#))
- Ensure robust filtering and monitoring systems are in place on the school's IT systems
- Ensure there is an annual review of the school's approach to online safety, including an annual risk assessment which gives due consideration to any risks faced by the school community

**d. Mobile Phones**

Children are not permitted to use mobile phones whilst on the School site, during school hours or whilst participating in school activities after the end of the normal school day. In exceptional circumstances, when pupils in Years 6, 7 and 8 are permitted to travel to and from school independently, mobile phones may be kept during the day in the School Office.

**e. Mobile Technologies (including BYOD)**

Mobile technology devices may be school owned/provided or personally owned. They might include Surface Go tablets, notebooks/laptops or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet, which may include the school's learning platform and other cloud-based services such as email and their individual Microsoft OneDrive data storage.

All users should understand that the primary purpose of using personal devices in a school context is educational.

Teaching about the safe and appropriate use of mobile technologies should be integral to the school's online safety education programme (*please see the IT progression of skills document in Appendix*).

f. **Early Years Foundation Stage**

i. **EYFS: Use of Mobile Devices (iPhones/iPads/iTouches)**

Mobile devices have a place in EYFS and on outings. They are often the only means of contact available in some circumstances and can be helpful in ensuring children are kept safe. Staff should always try to use a school device (iPad/Phone) but where this is not possible, the staff member is to inform their line manager when they have had to use their own device in EYFS.

To protect children, we will:

- ensure staff keep mobile phones stored out of the reach of children when not in use.
- only use mobile devices appropriately, and ensure staff have a clear understanding of what constitutes misuse and know how to minimise the risk.
- ensure the use of a mobile device does not detract from the quality of supervision and care of children.
- ensure all mobile device use is open to scrutiny.
- ensure staff are vigilant and alert to any potential warning signs of the misuse of mobile devices.
- ensure staff are responsible for their own behaviour regarding the use of mobile devices and should avoid putting themselves into compromising situations, which could be misinterpreted and lead to potential allegations.

ii. **EYFS: Photography and Images**

Most people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. However, due to cases of abuse to children through taking or using images, we must ensure that we have safeguards in place.

To protect children, we will ensure the following:

- use only the child's first name with an image
- EYFS designated iPads and SD cards are only used in Reception;
- children are appropriately dressed;
- images taken on the EYFS mobile device will not be emailed externally, and will be emailed internally only when other means of download to the School server are not readily available;
- personal cameras or mobile phones are not used to take photographs, video or audio recordings in our EYFS;
- 'Acceptable use' rules regarding the use of cameras by children are embedded in practice ensure the use of cameras, webcams and CCTV is closely monitored and open to scrutiny.

Photographs are taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements and are an effective form of recording their progression

in the Early Years Foundation Stage. They may also be used on our website and/or by the local press with permission from the parents. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care.

iii. **EYFS: Developmental Profiles**

- Upon registration at the setting, parents/carers sign consent for photographs to be taken for such purpose.
- Under no circumstances must cameras of any kind be taken into the toilets.
- Only designated EYFS cameras / iPads are to be used to take such photographs as referred to above.
- Images taken on this camera must be deemed suitable without putting the child/children in any compromising positions that could cause embarrassment or distress.
- All practitioners are responsible for the location and storage of the devices; this should be placed within a locked cupboard when not in use and devices must be locked away in the cupboard at the end of every day.
- Images taken and stored on devices must be downloaded to the school system as soon as possible; ideally, once a week.
- The computer must be password protected.
- Photographs are sometimes distributed to members of staff (key workers) to record in children's profiles, but Key workers are not permitted to make extra copies of the photographs in any format.
- It is recognised that photographs may be taken of children by parents at School functions such as concerts, sports days, trips, etc. However, they will be advised that these photos may not be shared on social media sites.

This section summarises our approach to online safety. For comprehensive details about our policy on online safety, please refer to our online safety policy, which you can find on our website [HERE](#).

**8. Notifying Parents or Carers**

- a. Any concerns about a child will be discussed with their parent/carers. In the event of a disclosure or safeguarding issue, parental contact will be made by the DSL, DDSL or designated member of staff following a consultation with the DSL.
- b. If the school believes that notifying the parents or carers would increase the risk to the child, then there will be a discussion with, and advice taken from the local authority children's social care team before any notification is made.
- c. The school will notify the parents/carers of all involved children where allegations of abuse have been made against other children unless this presents a risk. To ensure the school's approach to information sharing is consistent, the school will work with the police and/or the local authority children's social care.
- d. As decided on a case-by-case basis, the DSL will, along with any relevant agencies:
  - i. Meet with the victim and their parents/carers and discuss the measures put in place to ensure they are safeguarded, to ascertain what support they may want and need as well as how the report will be progressed
  - ii. Meet with the alleged perpetrator's parents/carers to discuss support for the perpetrator as well as any consequences that will have an impact, e.g. separation from the victim by moving classes, and any decision reason(s)

## **9. Pupils with Special Educational Needs, Disabilities (SEND) or Health Issues**

Our school recognises that additional safeguarding challenges are faced by pupils with SEND or certain health conditions. Research states that such children are three times more likely to be abused than their peers.

These additional barriers include:

- Any indicators of abuse, such as behaviour, mood and injury related to the child's condition, can be assumed as part of their condition without further exploration
- Higher prevalence of peer group isolation or bullying (including prejudice-based bullying) than other pupils
- Higher prevalence of being bullied without showing any outward signs
- Difficulties in managing or reporting these challenges due to communication barriers

In response to these barriers, our school offers additional pastoral support for these pupils, which includes:

- Supporting Speech and Language needs
- Implementing social stories
- Writing individualised Pupil Passports
- Referring to the school councillor
- Choc and Chat
- Close pastoral relationship between the child and the form teacher
- Building a bank of vocabulary to help children navigate difficult social scenario's (girls on board, boys on side)
- Explicitly teach all the children about SEND needs to create a culture of empathy and inclusivity

Our school will ensure that any abuse involving pupils with SEND will be managed by both the DSL and the Special Educational Needs Coordinator (SENDCO).

## **10. Pupils with a Social Worker**

Our school recognises that adverse or traumatic experiences may make a pupil vulnerable to further harm and create barriers to learning, behaviour and attendance. Our school staff will work with and support social workers to help protect vulnerable children.

For any pupil who has a social worker, consideration of this fact will be given by the DSL to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. This will inform decisions about:

- Any response to an unauthorised absence or missing education if there are known safeguarding risks
- Providing pastoral and/or academic support

## **11. Looked-After and Previously Looked-After Children**

- a. In line with the Children Act 1989, Children and Social Work Act 2017 and current statutory guidance, our school ensures that all looked-after children (LAC) and previously looked-after children (PLAC) are kept safe and supported to achieve their full potential.
- b. We define:
  - i. Looked-after children (LAC) as those who are in the care of the local authority under a care order or accommodated voluntarily.

- ii. Previously looked-after children (PLAC) as those who are no longer looked-after because they have been adopted, are subject to a child arrangements order, or a special guardianship order.
- c. The school ensures:
  - i. All relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements are shared with relevant and appropriate staff
  - ii. The DSL knows the details of children's social workers and relevant virtual school heads
  - iii. As statutorily required, our school has an appointed a designated teacher for looked after children, this is Rebecca Gascoigne, DDSL. They are, in line with [statutory guidance](#), responsible for promoting the educational achievement of looked-after children and previously looked-after children.
  - iv. The designated teacher has the relevant qualifications and experience to perform the role with appropriate training to fulfil it well.
- d. The designated teacher will:
  - i. Respond promptly and effectively to any safeguarding concerns relating to LAC or PLAC in partnership with the DSL.
  - ii. Ensure Pupil Premium Plus (PP+) funding is used effectively to meet the needs identified in each child's Personal Education Plan (PEP).
  - iii. Ensure the child's personal, emotional, and academic needs are prioritised throughout the school, advocating for their voice and needs.
  - iv. Lead the target-setting process for LAC and PLAC, and monitor progress and attainment, ensuring actions are implemented and reviewed regularly.
  - v. Undertake appropriate training to remain up to date with legal requirements and best practice.

## **12. Complaints and Concerns about School Safeguarding Policies**

### **a. Complaints Against Staff**

Any complaints-against staff where a child protection investigation may be required will be handled per our school's procedures for dealing with allegations of abuse against staff (see [Appendix 3](#)).

### **b. Other Complaints**

Early years: see the safeguarding and welfare section of the [Statutory Framework for Early Years Foundation Stage](#)-(section 3) and take account of requirements related to complaints.

### **c. Whistle-blowing**

Please refer to the schools Whistle-blowing policy within the Staff Handbook for concerns regarding-how the school safeguards pupils.

## **13. Record-Keeping**

Our school keeps all records in line with our records retention schedule.

As required, all safeguarding concerns are recorded in writing, including discussions and any decisions made with the reasons for those decisions.

As required, all safeguarding concerns are recorded in writing, including discussions and any decisions made with the reasons for those decisions. This includes instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.

All records include the following:

- A summary of the concern which is clear and comprehensive
- How a concern was followed up and resolved
- Details of decisions reached, action(s) taken and outcome(s) will be kept.
- Records which are non-confidential records will be readily accessible and available. Any confidential information and records are securely held and only made available to those with a professional need or right to do so.

Each child will have a separate child protection file, in which concerns and referrals will be kept.

Records which are non-confidential records will be readily accessible and available. Any confidential information and records are securely held and only made available to those with a professional need or right to do so.

Safeguarding records of individual children are kept after they have left the school for a reasonable time, usually 25 years.

Where there is an inquiry by the Independent Inquiry into Child Sexual Abuse (IICSA), any safeguarding records about such allegations of sexual abuse are kept for the term of the inquiry.

When a child moves to another school, it is the responsibility of the DSL to ensure that their child protection file is securely forwarded as soon as possible, separate from the main pupil file.

To enable the receiving school to have the appropriate support in place, this transfer of records should be:

- **Within 5 days** for an in-year transfer, or
- **Within the first 5 days** at the beginning of a new term

Where there are significant or complex concerns and/or involvement of social care, then the DSL will contact the receiving school's DSL, ensuring all relevant information is passed on to enable necessary preparations and a continuum of care.

- The school uses the Microsoft Sharepoint platform to store all electronic records; this is password protected and restricted in access to the DSL and DDSL's

In addition:

- See Appendix 2 for record-keeping for recruitment and pre-appointment checks
- See Appendix 3 for record-keeping for allegations of abuse made against staff

## 14. Training

### a. For all staff

All staff will receive safeguarding and child protection training (including whistle-blowing procedures, online safety, and the use of mobile/smart technology) as part of their induction.

This will be:

- Refreshed and updated **at least annually**

- Updated more frequently where there are changes in statutory guidance, local safeguarding arrangements, or emerging risks
- Integrated into the whole-school training programme so that safeguarding is embedded into all aspects of professional development and curriculum delivery
- Aligned with advice from local safeguarding partners

Training will cover:

- Statutory duties and responsibilities in identifying and reporting signs of abuse, neglect, exploitation, and other safeguarding concerns
- The school's safeguarding system, including procedures for reporting concerns, whistle-blowing, and managing allegations
- Online safety, the four risk categories (Content, Contact, Conduct, Commerce), and responsibilities under the Online Safety Act 2024
- Managing behaviour effectively to ensure a good and safe environment (*Teachers' Standards*)
- Understanding the needs of all pupils, including those with SEND, health needs, or other vulnerabilities
- Awareness of the *Prevent Duty*, including recognising risk indicators for radicalisation and extremism and how to make referrals

Any contractors employed through a Private Finance Initiative (PFI) or similar arrangement will be required to undertake safeguarding training relevant to their role.

All volunteers will receive safeguarding training appropriate to their responsibilities before beginning work with pupils.

b. For the DSL and DDSL(s)

The DSL and DDSL(s) will refresh their child protection and safeguarding training at least every 2 years. Additionally, their skills and knowledge will be updated regularly (at least annually). Likewise, the DSL and DDSLs will undertake Prevent training.

c. For Governance

All governors will receive safeguarding and child protection training (including online safety) at induction and will update this **at least annually** in line with *KCSIE* requirements.

Training will ensure governors can:

- Fulfil statutory duties and provide effective strategic challenge
- Monitor the effectiveness of safeguarding policies and procedures
- Support a whole-school safeguarding culture

The Named Safeguarding Governor will undertake more in-depth safeguarding training to effectively oversee and challenge safeguarding practice.

The Chair of Governors will receive specific training in managing allegations against the headteacher so they can fulfil the statutory *case manager* role if required.

d. Safer Recruitment: Interview Panels

Our school ensures that at least one person on an interview panel for any post at the school will have received training in safer recruitment. One trained person is the minimum requirement in line with *KCSIE* and local safeguarding procedures.

See Appendix 2 for safer recruitment procedures.

## 15. Arrangements for Monitoring

This policy must be reviewed annually by Matthew King (DSL) and must be approved by the full governing board. The school must ensure compliance with the Statutory Framework for the Early Years Foundation Stage (EYFS). This includes ensuring that staff have been subject to rigorous recruitment checks, including verifying qualifications, obtaining references, and conducting enhanced DBS checks with a check against the barred list. Additionally, the school must confirm that no staff member or volunteer is disqualified by association from working in an Early Years setting.

In addition, the policy will be updated:

- **Immediately** if there are significant changes in safeguarding legislation, statutory guidance (including *Keeping Children Safe in Education*), local safeguarding procedures, or best practice.
  - Following any serious safeguarding incident, inspection feedback, or lessons learned from internal reviews.
- A record of the review date, the reviewing officer, and the approving body will be maintained.

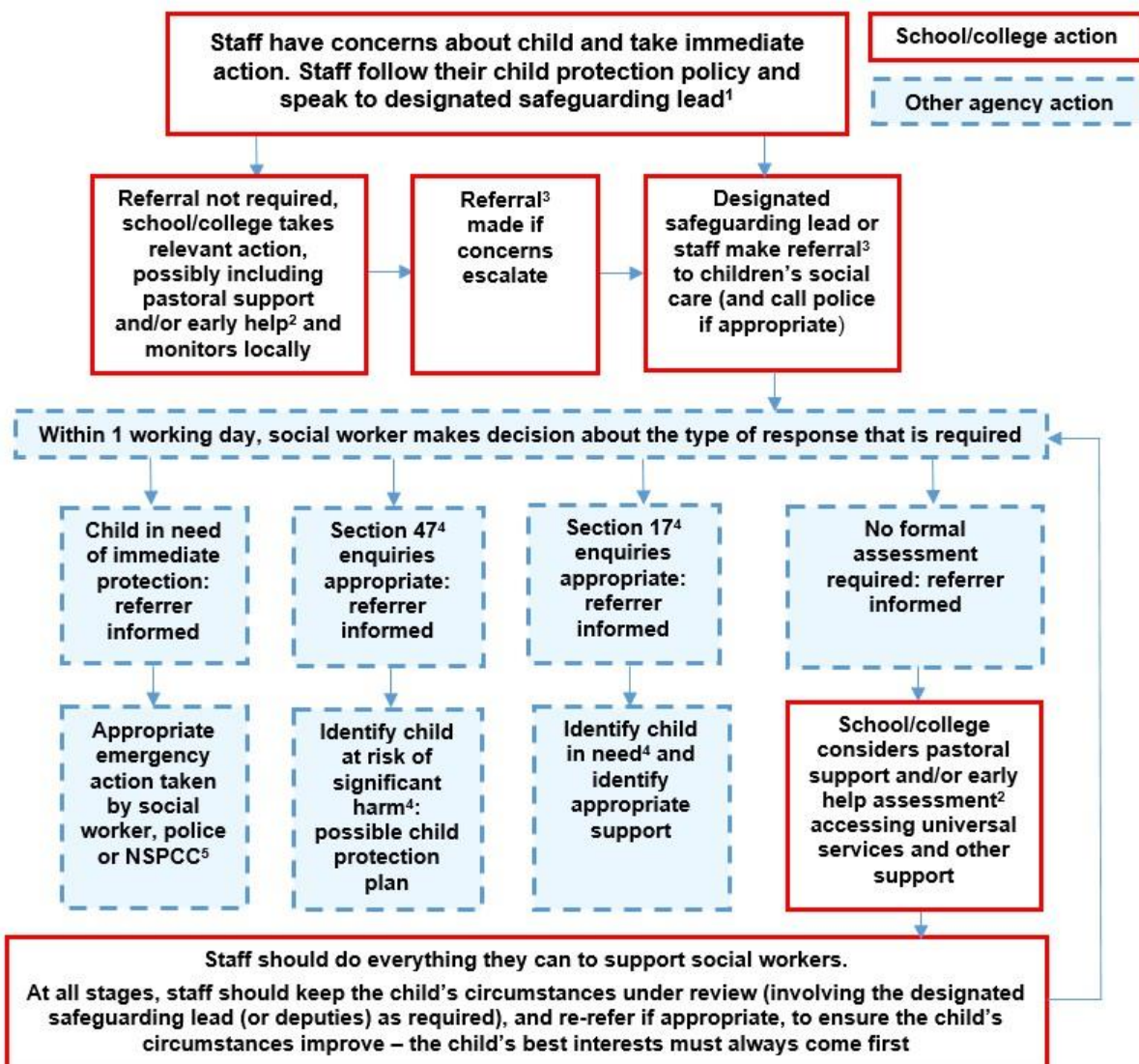
## 16. Other Policy Links

This policy links to the following policies and procedures:

- Staff Code of Conduct
- Behaviour & Discipline
- Anti-Bullying
- Child on Child Abuse
- Attendance
- Complaints
- Health and Safety
- E-Safety
- Acceptable Use of Mobile Phones, Cameras, E-mail systems and Internet
- Equality
- Relationships and Sex Education
- First Aid
- Curriculum
- Privacy Notices

All the following Appendices are based on the DfE's statutory guidance, Keeping Children Safe in Education. [Keeping Children Safe in Education](#)

Figure 1: Actions where there are concerns about a child (KCSIE 2023 p22)



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of the full version of KCSIE.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## **Appendix 1: Types of Abuse**

*Reviewed each year on the release of updated KCSIE.*

### **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. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. For example, this can be particularly relevant to the impact on children of all forms of domestic abuse. Children may be abused by an adult or adults or another child or children. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or by another child or children.

### **Physical abuse**

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

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

### **Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, due to maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate

food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures – PP checking**

### **Recruitment and Selection Process**

To ensure suitable people to work with children are recruited, those staff involved in recruiting and selecting staff receive safer recruitment training.

Our school has the following procedures to ensure our commitment to safeguarding and promoting children's welfare.

### **Advertising**

Our school makes the following clear in all adverts:

- Our school's commitment to safeguarding and promoting the welfare of children
- That all safeguarding checks will be undertaken, including enhanced DBS checks and, where applicable, a check against the barred list.
- The requirements and responsibilities of the role of safeguarding, i.e., the extent to which the role will involve contact with children
- If the role is exempt or not from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Where the role is exempt, the school is mindful that certain spent convictions and cautions are 'protected' and do not need to be disclosed, or if disclosed, they will not be considered
- That a full application must be submitted, and a curriculum vitae (CV) will not be sufficient to support safer recruitment practice
- That, should a candidate be shortlisted, online searches as part of our due diligence checks may be carried out

### **Application Forms**

To comply with the requirements of KCSIE, our school insists that full application forms must be completed for any posts in schools.

Our school applications forms include the following:

- A statement which makes it clear that it is an offence to apply for the role if an applicant is barred from engaging in a regulated activity relevant to children (where the role involves this type of regulated activity)
- A copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Personal details, current and former names, current address and national insurance number
- Details of their present (or last) employment and reason for leaving
- Full employment history (since leaving school, including education, employment and voluntary work), including reasons for any gaps in employment
- Qualifications, the awarding body and the date of award
- Details of referees/references, and
- A statement of the personal qualities and experience the applicant believes are relevant to their suitability for the advertised post and how they meet the person specification
- Confirmation that the information is true and any false information may result in disciplinary action or dismissal.

### **Shortlisting**

The shortlisting process will involve at least 2 people, who will also be on the interview panel for consistency, and will:

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

All shortlisted candidates will then:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children so that they have the opportunity to share relevant information and discuss it at the interview stage. The information we will ask for includes the following:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming that the information provided is true
- Our school will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online, as part of our due diligence checks. (For guidelines for online searches, see Appendix 5)

### **Seeking References and Checking Employment History**

Our school will request references before the interview, enabling any concerns raised to be explored further with referees and taken up with the candidate at the interview.

When seeking references, the school will:

- Not accept open references, e.g. to whom it may concern
- Not rely on applicants to obtain their reference
- Ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority. If the referee is school or college-based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations.
- College based; the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children); if the applicant has never worked with children, then ensure a reference from their current employer
- Always verify any information with the person who provided the reference
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify content where information is vague or insufficient information is provided

- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate
- Establish the reason for the candidate leaving their current or most recent post, and,
- Ensure any concerns are resolved satisfactorily before the appointment is confirmed

### **Interview and Selection**

When interviewing candidates, the school will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made during the interview process.

### **Pre-Appointment Vetting Checks**

The school records all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. The school follow all mandatory pre-employment requirements and best practices in retaining copies of these checks (see below).

### **New Staff**

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks. When appointing new staff, the school will:

- Verify their identity to be sure that the person is who they claim to be, including being aware of the potential for individuals changing their name. In line with best practice, the school will check the name on their birth certificate, where this is available
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). The school will obtain the certificate before, or as soon as practicable after, the appointment, including when using the DBS update service. A copy of the certificate will not be kept for longer than 6 months, but the school will still keep a record of the fact that vetting took place, the result of the check and the recruitment decision taken
- Obtain a separate barred list check where a candidate will start work in regulated activity before the DBS certificate is available. Note: such situations will be considered on an individual basis and wherever possible avoided. In such situations the newly appointed candidate will remain fully supervised until DBS clearance is received
- Verify their mental and physical fitness to carry out their work responsibilities by asking 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, including EU nationals. The school will keep a copy of this verification for the length of their employment plus two years. If there is uncertainty about whether an individual needs permission to work in the UK, then the school will follow advice on the gov.uk website
- Verify professional qualifications, as appropriate. The school will use the Teaching Regulation Agency's (TRA) Employer Access Service to verify any qualified teacher status (QTS) award and the completion of teacher induction or probation
- if the candidate is to be employed as a teacher, ensure they are not subject to a prohibition order
- Where candidates have lived or worked outside of the UK, the school will carry out further additional checks, including, where available:

- [Criminal records checks for overseas applicants](#) for all staff, including teaching positions:
- For teaching positions, the school will obtain a letter from the professional regulating authority in the country where the candidate has worked to confirm that there have not been any sanctions or restrictions imposed on them and/or the awareness of any reason why they may not be suitable to teach
- The school will check that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006 by ensuring all appropriate checks are carried out. Suppose a candidate falls outside of the scope of these regulations and the school does not carry out such checks. In that case, a record of our assessment will be kept on the individual's personnel file, including an evaluation of any risks and control measures put in place as well as any advice gained

**Regulated activity** - a person will be engaging in regulated activity with children if, as a result of their work, they:

- **Will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children**
- **Will be working on a regular basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives an opportunity for contact with children, or**
- Engage in intimate or personal care, healthcare, or any overnight activity, even if this happens only once.

### **Existing Staff**

There are certain circumstances where the school will carry out relevant checks. Such circumstances are:

- When there are concerns about the suitability to work with children of an existing staff member; or
- An existing staff member moves from a post that is not regulated to a post in regulated activity; or
- If an existing member of staff has had a break in service of 12 weeks or longer

In the case where an existing staff member harms or poses a risk of harm to a child or vulnerable adult, the school will refer to the DBS in the following circumstances:

- Where the school believes the staff member has engaged in [relevant conduct](#); or
- Where the school believes the staff member has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- Where the school believes the 'harm test' is satisfied in respect of the staff member (i.e. they may harm a child or vulnerable adult or put them at risk of harm); or
- Where the staff member has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and Third-Party Staff**

The school will ensure that written notification from any agency or third-party organisation confirms that the necessary safer recruitment checks on their staff working in our school have been performed. The school will then verify that the identity of the person working is the same person on whom the checks have been made.

### **Contractors**

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

- For regulated activity- An enhanced DBS check with barred list information
- Not in regulated activity but with an opportunity for regular contact with children - An enhanced DBS check, not including barred list information

The school will obtain the DBS check for self-employed contractors.

Copies of such checks will not be kept for longer than six months.

No contractors will be allowed to work unsupervised or engage in regulated activity under any circumstances unless checks have been satisfactorily carried out.

The school will check the identity of all contractors and their staff upon arrival.

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

### **Trainee/Student Teachers**

The school will ensure all necessary checks are carried out for salaried trainee teachers.

For fee-funded trainee teachers, the school will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee is suitable to work with children.

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

### **Volunteers**

The school will ensure that volunteers:

- Never work in regulated activity or are left unsupervised with children
- Have a risk assessment, which will be retained, whilst the school decides whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity
- To ensure that volunteers are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006., appropriate checks are carried out. Where the school decides that a volunteer falls outside of the scope of these regulations and will not carry out such checks but will retain a record of the assessment. This will include an evaluation of any risks and control measures put in place and any advice sought

### **Governors**

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

It is also a requirement that all governors also have a Section 128 check (as a Section 128 direction disqualifies an individual from being a maintained school governor).

### **Staff Working in Alternative Provision Settings**

If a pupil is placed with an alternative provision provider, the school will obtain written confirmation from the provider that all appropriate safeguarding checks have been carried out on all individuals working there. KCSIE states, *'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'*.

## **Appendix 3: Allegations of Abuse Made Against Staff**

### **Section 1: Allegations that may meet the harms threshold**

This section of the guidance applies where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

The school will consult our local authority designated officer (LADO) if there is any doubt as to whether a concern meets the harm threshold.

Any allegations of abuse will be dealt with quickly and fairly whilst providing consistent child protection in addition to also supporting the individual who is the subject of the allegation.

The headteacher, or the chair of governors where the headteacher is the subject of the allegation, will be the 'case manager' and lead any investigation.

Our school's procedures for dealing with allegations will be consistently applied with common sense and judgement.

### **Suspension of the accused until the case is resolved**

It is not the default position to suspend the accused and will only be considered in cases where:

- There is reason to suspect that a child or other children is/are at risk of harm, or
- The case is so serious that there might be grounds for dismissal

In such cases, an individual will only be suspended if there is no reasonable alternative, having considered all other options available.

The school will consider the following alternatives after an assessment of risk(s):

- Redeployment - within the school, removing direct contact with the child or children concerned or alternative work so as not to have unsupervised access to children
- The provision of another adult to be present when the individual has contact with children
- Moving pupils to other classes, removing contact with the individual. N.B. This is not a punishment; parents/carers must be consulted first.

The case manager can seek advice from the school's HR adviser and the designated officer at the local authority, as well as the police and children's social care involved.

### **Outcome definitions for allegation investigations**

- **Substantiated:** sufficient evidence has been provided to prove the allegation
- **Malicious:** sufficient evidence has been provided to disprove the allegation as it was found to be a deliberate act to deceive or to cause harm to the subject of the allegation
- **False:** sufficient evidence has been provided to disprove the allegation
- **Unsubstantiated:** insufficient evidence has been provided to neither prove nor disprove the allegation (no implication of guilt or innocence)

- **Unfounded:** used to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

The case manager will take the following steps when an allegation meets the above criteria:

- Ensure that before carrying on with the steps below, the facts are established to help determine whether there is any foundation to the allegation by conducting basic enquiries in line with local procedures
- Ensure the allegation is discussed with the designated officer at the local authority to consider the nature, content and context of the allegation and agree on a course of action. This should include discussing whether further enquiries are necessary to decide how to proceed and whether it is necessary to involve the police and/or children's social care services. (There are occasions when the case manager may consider involving the police before consulting the designated officer, e.g. if the accused individual is deemed an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the designated officer will be notified by the case manager as soon as possible after contacting the police)
- Ensure the accused individual is informed by the case manager of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, only information that has been agreed with those agencies will be shared with the individual
- Ensure, where appropriate (in the circumstances described above), to carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Seek advice from the designated officer, police and/or children's social care services as appropriate
- Ensure any concerns about the welfare of other children in the community or the individual's family are discussed with the DSL, making a risk assessment of the situation. Where necessary, the DSL may make a referral to children's social care
- Ensure the rationale for this is agreed upon and recorded with the designated officer if immediate suspension is considered necessary. The record must include information about considering alternatives to suspension and the reasons for rejection. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, including the named contact and their contact details at the school with whom the individual can liaise.
- Ensure **that if it is decided that no further action is to be taken** regarding the allegation or concerns, the decision is recorded, including the justification for this. Agree with the designated officer on what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- Ensure, **if it is decided that further action is needed**, steps are taken as agreed with the designated officer to begin the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Ensure effective support for the individual facing the allegation or concern is provided, including appointing a named representative to inform them of the case's progress and considering what other support is appropriate.
- Ensure the parents/carers of the child/children involved are informed about the allegation as soon as possible, following an agreement with children's social care services and/or the police, where applicable. The case manager will also inform the parents/carers of their requirement to maintain confidentiality

about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Ensure the parents or carers of the child/children involved are kept informed of the progress of the case (only about their child – no information will be shared regarding the staff member)
- Ensure a referral is made to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child or if the individual otherwise poses a risk of harm to a child
- As an early years provider the school will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations.

The school will immediately suspend an individual from teaching, pending the investigation's findings by the Teaching Regulation Agency if made aware that the secretary of state has made an interim prohibition order regarding the said individual in the school's employment.

In cases where the police are involved, the school may, at the start of the investigation, ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required later.

#### **Additional considerations for supply teachers and all contracted staff**

Where concerns or allegations are lodged against someone who is not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, the school will, in addition to our standard procedures, take the following actions:

- Find out the facts and liaise with the LADO to determine a suitable outcome before deciding to stop using an individual due to safeguarding concerns.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual or redeploy them to another part of the school whilst the school carries out the investigation
- The school will fully involve the agency but will take the lead in collecting the necessary information and providing it to the LADO as required
- The school will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account

The school will inform all agencies used of our process for managing allegations and keep them updated about our policies, as necessary. There may be occasions when an agency's HR personnel are invited to meetings.

#### **Timescales**

All allegations will be dealt with as quickly and effectively as possible, and where reasonably practicable, the school will aim to comply with the following timescales:

- Where an allegation is unsubstantiated or malicious, the resolution should be within one week
- Where an allegation does not require formal disciplinary action, appropriate action should be taken within three working days
- Where there is a requirement for a disciplinary hearing that can be held without further investigation, this should be held within 15 working days

The above timescales are aims; if they are not met, the school will take the necessary action as soon as possible.

## **Specific Actions**

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

There will be a discussion between the case manager and the local authority's designated officer to ascertain whether there needs to be any further action, including disciplinary action and how to proceed, considering information provided by the police and/or children's social care services.

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

The school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required in cases where the allegation is substantiated, the individual is dismissed, the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services.

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

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

Based on the case's conclusion, the case manager will consider how best to facilitate a return to work for any individual where it is decided that the suspension is lifted.

Consideration will also be given by the case manager on how best to manage the individual's contact with the child or children who made the allegation if they are still attending the school.

### **Unsubstantiated, unfounded, false or malicious reports**

In the case where a report is:

- Found to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. A referral to children's social care may be appropriate if it is considered that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help
- Found to be deliberately invented or malicious, there will be consideration by the school as to whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

All records about any case where the allegation or concern meets the criteria above will be managed by the case manager and stored on the individual's confidential personnel file for the duration of the case.

Following an investigation, records of any allegation found to be malicious or false will be deleted from the individual's personnel file (unless the individual wishes for it to remain).

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

- A summary of the allegation, which is clear and comprehensive
- How the allegation was followed up and resolved
- Any action notes were taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

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

In the cases where records contain information about allegations of sexual abuse, the school will keep these for the Independent Inquiry into Child Sexual Abuse (IICSA) for the inquiry term. The school retains all other records at least until the individual has reached normal pension age, or for ten years from the date of the allegation if that is longer.

### **References**

When the school provides an employer reference:

- There will not be any reference to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Substantiated allegations will be included as long as the information is factual and does not include opinions

### **Learning lessons**

Following any cases where the allegations are substantiated, the circumstances of the case will be reviewed by the case manager with the local authority's designated officer and determine whether improvements could be made to the school's procedures or practice to prevent similar events from happening in the future.

Consideration will be given to the following:

- Any issues which may have arisen from the decision to suspend the member of staff
- The length of time of the suspension
- The justification for suspension
- The use of suspension in the case where an individual is subsequently reinstated and how, in future investigations of a similar nature, could the investigation be carried out without the need to suspend the individual

### **Non-recent allegations**

Abuse can be reported at any stage in the future.

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

If an adult makes a historic allegation to the school citing abuse as a child, the school will advise the individual to report the allegation to the police.

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

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

Concerns that may arise through:

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

All concerns will be responded to and dealt with promptly to safeguard children's welfare.

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

The term 'low-level' concern is any concern that an adult working in or on behalf of the school may have acted in a way that:

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

Such behaviour could include, but is not limited to:

- Photographing children on a personal mobile phone
- Inappropriate, overly friendly interactions with children
- Engagement with a single child in a secluded area or behind a closed door
- Humiliating pupils

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

The school encourages all staff to confidentially share low-level concerns so that they can be addressed appropriately and, therefore, aims to create a culture of openness, trust and transparency to enable this.

The school creates this culture by:

- Ensuring staff have clarity about what appropriate behaviour is and have the confidence to distinguish between expected and appropriate behaviour from behaviours that are concerning, problematic or inappropriate behaviour in themselves and others
- Ensuring staff are empowered to share any low-level concerns as per [Concerns about a staff member, supply teacher, volunteer or contractor](#) section of this policy
- Ensuring staff are empowered to self-refer
- Ensuring any unprofessional behaviour is addressed, and support is given at an early stage to any individual who needs to correct it
- Ensuring the provision of a responsive, sensitive and proportionate handling of such concerns when they are raised
- Ensuring staff are empowered to identify and report any weaknesses in the school's safeguarding system
- The above is reinforced through a rigorous induction process
- Anonymised data is shared at termly staff meetings and with the governors at full board level

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

Where a third party raises concerns, the headteacher will collect evidence where necessary by speaking:

- To the referring person directly, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will determine any further action using the information collected, in line with the [Staff Handbook](#). In the case of all low-level concerns, the Headteacher will make the ultimate decision, though this may be in consultation with the DSL.

[Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

### **Record Keeping**

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

Records will be:

- Will comply with the DPA 2018 and UK GDPR and be kept confidential and held securely
- Reviewed to help identify any potential concerning, problematic or inappropriate behaviour patterns. If a pattern of such behaviour is identified, the school will decide on a course of action, either through disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Section 1 of this Appendix, a referral will be made to the designated officer at the local authority
- Retained at least until the individual leaves' employment at the school

In the case of a low-level concern relating to a supply teacher or contractor, the school will notify the individual's employer to identify any potential patterns of inappropriate behaviour.

### **References**

Low-level concerns will not be included in references unless:

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

## **Appendix 4: Specific Safeguarding Issues**

### **a. Children Missing from Education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may consist of sexual abuse or exploitation and can also be a sign of child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff must be aware of their school's or college's unauthorised absence and children missing from education procedures.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

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

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

In the instance where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register after making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause. At this point the school would notify the local authorities.

If necessary, parents should be informed in writing of this in advance and every step should be taken to ensure the pupil is returned to education within the 2-week period.

To mitigate this risk the school:

- Reviews attendance weekly through Year Group meetings
- Concerns are noted at Pastoral Care Team meetings where actions are sanctioned
- Termly figures are noted at the Full Board meeting by the DSL

All staff receive training to help them spot the signs and individual triggers to consider, which may indicate potential safeguarding concerns and may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

All local child protection procedures are followed by staff if there is a suspicion that a child is suffering from harm or neglect. An immediate referral to the local authority children's social care team, and the police, will be made if the child is suffering or likely to suffer from harm or in immediate danger.

OFS Attendance Policy - [LINK](#)

Statutory Guidance - [LINK](#)

**b. Child Abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility.

Community safety incidents may include:

- \* Approaches by strangers
- \* Attempts to lure children into cars
- \* Abductions (including parental abduction)
- \* Other risks within the local area

Staff should be alert to:

- \* Reports from pupils of being followed or approaches
- \* Changes in behaviour indicating fear of travelling to or from school
- \* Knowledge of recent police alerts or community reports

The school will:

- Share age-appropriate safety messages with pupils (e.g., "stranger danger", safe travel routes)
- Communicate promptly with parents about known incidents in the local area
- Liaise with the police and local safeguarding partners where risk is identified

**c. Children and the Court System**

Children may need support if they:

- Have to give evidence in criminal courts (as victims or witnesses)
- Are involved in family courts due to parental separation, care proceedings, or custody disputes

The school will:

- Use resources such as *Ministry of Justice guidance* for young witnesses
- Offer pastoral support and signpost to specialist services (e.g., Witness Service, CAFCASS)
- Liaise with parents/carers and relevant agencies while maintaining confidentiality as required

**d. Children with Family Members in Prison**

Children who have a parent or close family member in prison may experience stigma, isolation, and emotional distress, and may be at increased safeguarding risk.

The school will:

- Maintain confidentiality while ensuring staff directly involved with the child are aware of the circumstances
- Provide targeted pastoral and mental health support
- Signpost to charities such as *Barnardo's* or *PACT* who specialise in support for children of prisoners

- Work with parents/carers, probation services, and other professionals to maintain stability and routine for the child

**e. Child criminal exploitation – including County Lines**

Child criminal exploitation (CCE) is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity. This may be in exchange for something the child needs or wants, or for the financial or other advantage of the perpetrator.

County lines is a specific form of CCE. It refers to the criminal exploitation of children and vulnerable adults by gangs and organised criminal networks to transport, store, and sell illegal drugs across different areas, often using dedicated mobile phone “lines”. Exploitation may involve:

- Moving children between locations to deliver drugs or money
- Using children’s homes as bases for criminal activity (“cuckooing”)
- Threatening violence towards the child or their family
- Taking control of the child’s phone, travel, and movements

Children exploited in county lines activity are often exposed to physical, emotional, and sexual abuse, and are at high risk of serious violence and criminalisation.

The school knows that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection) and/or will be to the perpetrator or facilitator's financial benefit or another advantage, such as increased status.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there is a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Indicators of CCE (including county lines) can include a child:

- Appearing with unexplained gifts, money, or new possessions
- Associating with other young people involved in exploitation
- Suffering changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education
- Travelling alone to places far from home, particularly on public transport
- Being found in accommodation they have no connection to, or in “trap houses”

- Having more than one mobile phone or SIM card
- Being in contact with controlling or older individuals

If a staff member suspects CCE or county lines, this will be discussed with the DSL. The DSL will make a referral to the local authority's children's social care team and the police, if appropriate, triggering the local safeguarding procedures.

**f. Modern Slavery**

Modern slavery encompasses human trafficking, slavery, servitude, and forced or compulsory labour. It is a form of abuse and exploitation that can affect both children and adults.

Children may be trafficked into the UK or within the UK for purposes including sexual exploitation, forced labour, domestic servitude, or criminal activity.

Possible indicators include:

- Evidence of control by another person
- Signs of physical abuse or untreated injuries
- Fearful, withdrawn behaviour or reluctance to speak
- Lack of access to education
- Involvement in work or activities inappropriate for their age

If staff suspect a pupil may be a victim of modern slavery, they will:

- Immediately inform the DSL
- Follow the *National Referral Mechanism* process via children's social care
- Liaise with the police where appropriate

**g. Cybercrime**

Cybercrime is criminal activity committed using computers or the internet. Children can be both victims and, sometimes unknowingly, perpetrators.

Types include:

- Hacking
- Distributed Denial of Service (DDoS) attacks
- Making, possessing, or distributing indecent images of children
- Cyberbullying, harassment, and online fraud

Children vulnerable to cybercrime may have:

- Advanced technical skills for their age
- Significant interest in computing and coding without an understanding of the law
- Poor online boundaries and risk awareness

The school will:

- Educate pupils about online risks as part of our computing and PSHE curriculum
- Use the *Online Safety Act 2023* principles to ensure filtering and monitoring systems are robust

- Work with police and agencies such as the *Cyber Choices* programme where a child is at risk of offending

#### **h. Child sexual exploitation**

CSE is the process where a child, male or female under the age of 18, is exploited for sexual purposes. It is a form of child abuse where the child receives something, e.g., affection, gifts, drugs, alcohol, cigarettes, money or accommodation due to performing and or allowing others to perform on them sexual activities. They may be knowingly or unknowingly coerced into sexual activity inappropriate for their age.

In the UK, the law defines a child as a person under the age of 18. Even though the legal age of consent to sexual activity is age 16, due to the abusive nature, CSE applies to all children up to the age of 18.

Sexual activity is a broad term but includes watching sexual acts, inciting sexual activity and penetrative sexual acts. Sexual activity involving children under 13 is unlawful as they are deemed not to have the legal capacity to consent to such activity. Sexual activity which involves children under the age of 16 is illegal. However, a court will consider the circumstances of peer-to-peer sexual activity.

HM Government guidance defines sexual abuse as:

**"Involving, 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."**

This definition has been expanded to highlight that:

**"It can also occur through the use of technology without the child's immediate recognition, e.g., the persuasion to post sexual images on the Internet / mobile phones with no immediate payment or gain".**

And that:

**"In all cases, those exploiting the child / young person have power over them by virtue of their age, gender, intellect, physical strength and or other resources."**

The prevalence and availability of technology provide a further medium where abusers can exploit children. It is illegal to take, possess or share indecent images of anyone under 18, even if they are the person in the picture. The term indecent applies to images of a naked person, a topless girl or if genitals or sex acts (including masturbation) are displayed.

Recent statistics show that the age of online service users is getting younger, which places more children at risk of CSE abuse. This access to technology, social networking sites and mobile devices offers the abuser further mediums to groom, coerce, blackmail and exert control.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **i. Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This includes both face-to-face and online behaviours, and may occur simultaneously across both contexts. Online forms include abusive, harassing, and misogynistic messages; non-consensual sharing of nude or semi-nude images; coercion into sexual activity via digital platforms; and exposure to pornography without consent.

Our school has a zero-tolerance approach to sexual violence and sexual harassment and recognises that even if there are no reports, this does not mean that this kind of abuse is not happening here.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes referred to as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including any online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (including any online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (sometimes referred to as sexting or youth-produced sexual imagery)
- Upskirting, which usually involves the taking of photographs under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation and distress
- Initiation/hazing type violence and rituals (including activities involving harassment, abuse or humiliation used as a way of initiating a person into a group/gang and may also be online)

Child-on-child online abuse can take the form of, for example messages which are abusive, harassing and/or misogynistic, the non-consensual sharing of indecent images, and the sharing of abusive images and pornography to those who don't want to receive such content.

Staff will follow the procedures set out in the [Recognising abuse and taking action](#) section of this policy if they have any concerns about child-on-child abuse or if a child makes a report to them. Our school's approach to this type of abuse can be seen in sections [Allegations of abuse made against other pupils](#) and [Sharing of nudes and semi-nudes](#) of this policy.

The school will always consider the ages and stages of development of pupils when considering instances of harmful sexual behaviour between children. Our school recognises that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer appropriate support.

### **i. Domestic abuse**

Under the Domestic Abuse Act 2021, domestic abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Witnessing domestic abuse is recognised as a form of child abuse. Whilst the majority of cases feature abuse by a partner or ex-partner,

domestic abuse can also be perpetrated by a family member or carer. Such abuse may occur on a one-off incident or as a pattern of incidents which may include:

- Coercive and controlling behaviour
- Threatening behaviour
- Violent behaviour
- Sexual violence
- Degrading behaviour where the victim is made to feel worthless
- Harassment
- Stalking
- Financial or economic abuse
- Online / digital abuse

Domestic abuse can happen in any relationship and can continue even after a relationship has ended. Such behaviour is not limited to incidents inside the home and may occur in public situations via smartphones, social networking and the internet. It is important to remember that both women and men may be victims and perpetrators. Witnessing any form of domestic abuse can seriously harm children and young people; this is recognised as a form of child abuse.

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

**j. Homelessness**

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

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

The DSL will also refer to children's social care where a child has been harmed or is at risk of harm.

**k. So-called 'honour-based' abuse (HBA)**

HBA, sometimes called honour crime or izzat, is a term used to describe practices used to control a person's behaviour in family or community settings to protect perceived cultural or religious beliefs. HBA includes incidents or crimes committed to protect or defend the honour of a family or community, and can include FGM, forced marriage, and other abuses. It can affect both males and females. HBA occurs when a perpetrator acts violently on a relative, they believe has brought shame upon the family or community by breaking the perceived honour code.

Such action may include:

- Domestic and/or sexual violence
- Forced marriage
- Female Genital Mutilation (FGM)
- Abduction
- Murder

All forms of HBA violate a person's rights. It is a form of abuse. The factor distinguishing HBA from other types of abuse is the approval and/or collusion of the victim's family or community.

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

## I. **Female Genital Mutilation (FGM)**

FGM is a form of child abuse that can lead to extreme and lifelong physical and psychological suffering for women and girls. FGM comprises all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. Generally, girls undergo female genital cutting from around the age of 3. However, this may vary depending on the type of ritual/custom of the local village, region or belief system.

If you discover that FGM has taken place or a pupil is at risk of FGM, this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help but not being explicit about the problem
  - Talking about pain or discomfort between her legs

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

- The girl's family has a history of practising FGM (this is the biggest risk factor to consider)
- FGM is known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having a limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- o Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- o Being unexpectedly absent from school
- o Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

**m. Forced marriage**

Forced Marriage is when one or both parties do not fully or freely consent to the marriage but are subjected to physical and or emotional pressure to marry. This may be in the form of coercion, threats, violence or emotional/ psychological pressure. Forced marriage also applies to a marriage involving a person without the capacity to consent to the marriage, as defined in the Mental Capacity Act 2005, whether or not coercion or the above measures are used. This includes persons with physical or learning disabilities. Whatever form used, pressure which forces someone into a marriage is an abuse of their human rights and is a crime.

The term marriage applies to any religious or civil ceremony, whether or not legally binding. It is important to distinguish between forced marriage and arranged marriage. In an arranged marriage, families may actively select a partner for a family member; however, both spouses fully consent to the marriage.

Staff will receive training about forced marriage and the presenting symptoms. The school is aware of the ‘1 chance’ rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor as appropriate

**n. Preventing radicalisation**

**Radicalisation-** is defined by the Home Office as:

**“The support of terrorism and extremist ideologies associated with terrorist groups”.**

**Extremism –** is defined by the HM government as

**“the vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.”**

**Terrorism-** is defined by The Terrorism Act 2000 as

**“...the use or threat of one or more of the actions listed below, and where they are designed to influence the government, or an international governmental organisation or to intimidate the public. The use or threat must also be to advance a political, religious, racial or ideological cause.”**

The specific actions included are:

- Serious violence against a person
- Serious damage to property
- Endangering a person's life (other than that of the person committing the action)
- Creating a serious risk to the health or safety of the public or a section of the public; and
- Action designed to interfere with or seriously disrupt an electronic system.

Schools must prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and ensure that staff can access appropriate training to identify children at risk.

The school will assess the risk of children in our school being drawn into terrorism. This assessment will also consider the potential risk in our local area in collaboration with our local safeguarding partners and police force.

In line with the Online Safety Act 2023, our school will ensure that our filtering and monitoring systems are effective in restricting access to harmful content and that pupils are educated about online radicalisation risks.

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

Staff will be alert to changes in pupils' behaviour.

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

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

It is important to note that these signs can also be part of normal teenage behaviour; however, children at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Our school encourages staff to have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures in the [If you have concerns about extremism](#) section of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation is set out in other school policies and procedures, including <list any relevant policies here – for example, you may cover this in your curriculum policy, behaviour policy, online/e-safety policy, and/or others>.

**o. Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children, regardless of age and sex
- Through the sexual assault or sexual harassment of a single child or group of children by a group of children
- Both physically and verbally, online and/or face to face

There is a continuum of sexual violence and sexual harassment that may overlap.

Victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Their educational attainment will be adversely affected and exacerbated if the alleged perpetrator(s) attends the same school.

Staff must reassure any victim who reports an incident that they are being taken seriously and will be supported and kept safe. At no point should a victim feel that they have created a problem by reporting abuse or neglect, nor should they feel any shame for reporting.

Staff will support victims by:

- Ensuring victims are reassured that the law on child-on-child abuse is there not to criminalise them but to protect them
- Ensuring decisions and actions are reviewed regularly, and policies are updated with any lessons learnt
- Ensuring that any potential patterns of concerning, problematic or inappropriate behaviour are looked out for with a course of action implemented where any patterns are identified
- Ensuring that consideration is given to any wider cultural issues within the school that have enabled the inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Ensuring that they remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs

Some groups are potentially more at risk, such as girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children.

Staff should always:

- Challenge behaviours which are inappropriate
- Ensure they make it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and is not a 'normal' part of growing up
- Challenge physical behaviours (potentially criminal), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. It is not acceptable to dismiss or tolerate such behaviours as this risks normalising them

Staff will follow the procedures set out in the Recognising Abuse and taking action section of this policy if a child makes a report to them or they have any concerns about sexual violence or sexual harassment. The section Allegations of abuse made against other pupils and Sharing of nudes and semi-nudes gives our school's approach to this type of abuse.

**p. Serious violence**

A child who is at risk from or is involved in serious crime may display the following behaviour(s):

- Absence from school increases
- Having relationships with older individuals or groups or a change in their friendship group
- Performance significantly declines
- Significant changes in well-being or signs of self-harm
- Increase in unexplained injuries or signs of assault
- Unexplained gifts or new possessions (indicating that the child is involved with, or has been approached by, individuals in criminal networks or gangs and may be at risk of criminal exploitation)

Here are the risk factors which increase the likelihood of involvement in serious violence:

- Male
- Frequent absence or permanent exclusion from school
- A victim of child maltreatment
- Previous involvement in offending, such as theft

These indicators and risk factors are shared with all staff as part of their safeguarding training. Where a staff member is concerned about a pupil being involved in, or at risk of, serious violence, they must report this to the DSL.

**q. Checking the identity and suitability of visitors**

Upon visiting our school, all visitors must verify their identity to the satisfaction of staff and leave their belongings, including their mobile phone(s), in a safe place.

Where a visitor is not known to our school, office staff will check their credentials and the reason for their visit before allowing them to enter. Our school will check the identification of all visitors.

Visitors must sign as per our school system and wear the visitor's badge given to them.

Any visitor attending for a professional purpose will be asked to show a photo ID and:

- Must show their DBS certificate, which will be checked alongside their photo ID; or
- Written confirmation from the organisation they work for must be provided to reassure the school that an appropriate level of DBS check has been carried out
- Staff members will accompany all other visitors, including visiting speakers, throughout their visit

The school will not invite any speaker known to disseminate extremist views into the school. It will ensure that appropriate checks are conducted to ensure that any individual or organisation using school facilities is not seeking to spread extremist views or radicalise pupils or staff.

**r. Non-Collection of Children**

Missing pupils

School procedures are in place to ensure that any child who goes missing is found and returned to effective supervision immediately. If a child goes missing, our school will follow the [Missing Child Procedure](#).

**s. Use of the School Site by Outside Organisations**

- Where the school hires or loans its facilities to an outside organisation it will ensure that, as far as is reasonably practicable all appropriate safeguarding and child protection policies and procedures are in place and will ask to see such documentation from potential hirers.

Outside organisations should follow their own safeguarding policy and procedure but are also made aware of the Orley Farm Safeguarding Policy hire agreement. Failure to provide the correct documentation may result in the termination of any such agreements.

#### Appendix 5: Guidelines on Checking the Online Presence of Job Applicants

Paragraph 221 of KCSIE states:

Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK. For example:

- if they have a criminal history
- if they are included on the children's barred list
- if they are prohibited from teaching
- if they are prohibited from taking part in the management of an independent school
- information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
- if they are known to the police and children's local authority social care
- if they have been disqualified from providing childcare (see paras 269-273), and
- any relevant overseas information.

Whilst there are no legal issues specific to checking social media, the school, as the employer, will ensure that any information found to discriminate against a candidate unlawfully will not be used. KCSIE states in paragraph 226, "In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks"

The school ensures best practice guidelines guide procedures. These are as follows:

#### **1. Why it is relevant**

The reasons for online checks are broadly to ensure safeguarding and reputation: not recruit anyone unsuitable to work with children and/or will bring our school into disrepute

Therefore, our school will use online checks for any evidence of the following:

- Inappropriate or offensive behaviour, language or jokes
- Comments of a discriminatory nature
- Photographs which are inappropriate
- Misuse of drugs or alcohol
- Anything that calls into question their suitability to work with children.

#### **2. Where to look**

The school employs SP Index to conduct online checks on all social media platforms

#### **3. Who undertakes the search**

To ensure that any risk of discrimination is minimised, online reviews are carried out by someone not directly involved in the recruitment process. That person will then feed any relevant information that impacts safeguarding or reputation only into the recruitment process. In our school, that person will be the HR manager - Purvi Patel. Information such as age, gender, or race irrelevant to the recruitment process will not be passed on.

#### **4. What to do with the information**

Any information revealed will be reviewed, and, if appropriate, concerns will be addressed to the candidate by the recruitment panel. All such information will be treated like any other information relevant to the process, such as information in the application form, the DBS certificate and the references.

**[Appendix 6: Record of Concern Form - ROC Template.docx](#)**