



'We can and we will'
GLEBE PRIMARY SCHOOL

Child Protection & Safeguarding Policy, including Whistleblowing, Allegations Against Staff and Low-Level Concerns

School Designated Safeguarding Lead: Melanie Penney (Headteacher)

To deputise in her absence: Jennifer Griffiths (Deputy Headteacher)

**Safe Guarding Team: Melanie Penney, Jennifer Griffiths, Hannah Imane, Clare Sheldon,
Joe Dwyer & Jerushia Connolly**

Governor Responsible for Safeguarding and Child Protection: John Buckingham

To deputise in his absence: Mrs Patricia Swindells

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Important Contacts

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|--|---|
| Designated safeguarding lead (DSL) | Melanie Penney | 01895 462 385 office@glebeprimary.org |
| Safeguarding Team Members | Jenny Griffiths, Hannah Imane, Clare Sheldon, Jerushia Connolly, Joe Dwyer | 01895 462 385 office@glebeprimary.org |
| Local authority designated officer (LADO) | Hannah Ives | hives@hillingdon.gov.uk 01895 250975 07753431285 |
| Chair of governors | John Buckingham | 01895 462 385 office@glebeprimary.org |
| Channel helpline | | 020 7340 7264 |

1) Mission Statement:

At Glebe Primary School, we believe in an ethos that values the whole child. We strive to enable all children to achieve their full potential academically, socially and emotionally.

2) Introduction

The health, safety and well-being of all our pupils are of paramount importance to all the adults who work in our school. All pupils have the right to opportunity and protection, regardless of age, gender, race, culture or disability.

3) Aims and Objectives

This policy is designed to ensure that all staff (this includes all persons on site, including the premises staff, admin staff, contractors, volunteers and governors) are clear about their responsibilities with regard to the promotion of pupils' welfare and the actions necessary, should they have a concern about a possible child protection issue. Its aims are:

- To encourage the promotion of opportunities to help children to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being;
- To raise the awareness of all staff and identify responsibility in reporting possible cases of abuse;
- To ensure effective communication between all staff when dealing with child protection issues;
- To lay down the correct procedures for those who encounter an issue of child protection
- To ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- To ensure that all staff are aware of their statutory responsibilities with respect to safeguarding;
- To ensure that all staff are properly training in recognising and reporting safeguarding and child protection issues.

While this policy focuses predominantly on issues around child protections (including neglect, abuse, exploitation etc.) all staff should be very clear about the safety of children in all aspects of school life. Therefore, we should be very clear on all aspects of health and safety across the school and the policies and procedures to keep children safe and well. These include policies and procedures for off site visits, start and end of school procedures, play and lunchtime procedures and after school clubs and activities. It is imperative that all staff are fully conversant with the expectations on safety in school. The staff handbook gives a clear summary and signposts the additional information.

4) Legislative Background

This policy is based on the Department for Education's statutory guidance

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf NPCC [When to Call the Police Guidance for Schools and Colleges](#), [Sharing Nudes and Semi Nudes Advice for Schools](#), [Working Together to Safeguard Children \(2018\)](#), the [DFE data protection guidelines](#) and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

Section 175 of the [Education Act 2002](#), places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), sets out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.

The *Education Act 2002* <https://www.legislation.gov.uk/ukpga/2002/32/contents> places a statutory duty on all schools to safeguard children, to promote their welfare and to ensure everyone plays their full part in safeguarding children from abuse and neglect.

Every Child Matters (2003), the government's vision for children's services, proposed reshaping children's services to help children to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/272064/5860.pdf

[The School Staffing \(England\) Regulations 2009](#), sets out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

[The Children Act 1989](#) (and [2004 amendment](#)), provide a framework for the care and protection of children.

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

[Statutory guidance on FGM](#), sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

[The Rehabilitation of Offenders Act 1974](#), outlines when people with criminal convictions can work with children.

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.

[Statutory guidance on the Prevent Duty](#), explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.

[The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

[The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it

could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

The DFE has published a series of helpful guides, including *Working Together to Safeguard Children (2013)*, *Guidance for Safer Working Practice for Adults who work with Children and Young Adults in Education Settings (2015)* and *Keeping Children Safe in Education (2021)*. On a reasonably regular basis updates are issued and incorporated in to this policy as necessary.

This policy should be read in conjunction with other key safeguarding policies – bullying, equal opportunities, First Aid, Health and Safety, Inclusion.

5) Definitions (from Working Together to Safeguard Children)

'Safeguarding and promoting the welfare of children' is activity which is proactive and promotes safe and effective care for all children.

This, therefore, means we are:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

'**Child protection**' refers to the activity taken to protect specific children who are suffering, or at risk of suffering, significant harm.

'**Abuse**' is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

'**Significant harm**' is the threshold that justifies compulsory intervention in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. It may be a single traumatic event, or may be a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical or psychological development.

'**Neglect**' is the persistent failure to meet the child's physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

'**Physical Abuse**' is physical injury to a child caused, for example, by hitting, shaking, throwing, scalding, or poisoning where the injury was deliberately inflicted or knowingly not prevented.

'**Sexual Abuse**' involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, or non-contact activities such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

'**Emotional Abuse**' is the severe adverse effect on the behavioural and emotional development of the child caused by persistent or severe emotional ill-treatment or rejection.

'**Sharing of nudes and semi-nudes**' (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video. 'Children' includes everyone under the age of 18.

Children includes everyone under the age of 18

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

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

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- **The local authority (LA)**
- **Integrated care boards (previously known as clinical commissioning groups) for an area within the LA**
- **The chief officer of police for a police area in Hillingdon**

6) Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions ([see section 22](#));
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality ;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation ([see section 11](#)) ;
- Are asylum seekers;

- Are at risk due to either their own or a family member's mental health needs ;
- Are looked after or previously looked after ([see section 23](#));
- Are missing from education([see section 25](#));
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

7) Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programmes of relationships, sex and health education (RSHE) and Personal social Health Education (PSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

7.1 All staff

Staff who work directly with children are expected to read at least part 1 of [Keeping Children Safe in Education \(KCSIE\)](#). Staff who don't work directly with children read part 1 of KCSIE or annex A of KCSIE.

All staff will sign a declaration at the beginning of each academic year to say that they have read and understood the guidance. They will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online). They will also provide a safe space for pupils who are LGBT to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and safe guarding team, the behaviour policy, the online safety policy (which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring), the social media policy and the children who go missing from education policy;
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment ;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines);
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- What to look for to identify children who need help or protection

[Section 10](#) of this policy outlines in more detail how staff are supported to do this.

7.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is the Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Telephone: 01895 462385

Email: office@glebeprimary.org

When the DSL is absent, the Deputy Headteachers and Pastoral Support Worker will act as cover. If the DSL, pastoral support worker and deputies are not available, the SENCO and Head of the Special resource Provision (SRP) will act as cover.

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

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

- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate;
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies;
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support;
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

7.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation;
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and our school's local multi-agency safeguarding arrangements,
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL;
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns;
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Please see our Policy Statement of Procedures for Dealing with Allegations of Abuse Against Staff

- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised;
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see sections [14](#) and [29](#)).

All governors will read Keeping Children Safe in Education in its entirety.

7.4 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction;
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect ;
- Communicating this policy to parents/carers when their child joins the school and via the school website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate ([see section 14](#));
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the safeguarding team on this;
- Ensuring the relevant staffing ratios are met, where applicable.

7.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

8) Confidentiality

- At Glebe we follow the DfE's data protection guidance to ensure that we comply with data protection laws, develop data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches. Our approach to confidentiality and data protection is outlined in the GDPR policy.
- Timely information sharing is essential to effective safeguarding;

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- The Data Protection Act (DPA) [2018](#) and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies;
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children;
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk);
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care;
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains;
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system;
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved;
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities;
- The government's [information sharing advice for safeguarding practitioners includes 7 'golden rules'](#) for sharing information, and will support staff who have to make decisions about sharing information;
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy);
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff.

9) Safeguarding and the Promotion of Children's Welfare

- All staff must contribute towards the creation and maintenance of a safe learning environment.

- The culture of Glebe Primary, encourages children to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being. The example set by the teachers and other staff; school policies such as Anti-bullying, Welfare and Equal Opportunities; assembly, PSHE and Circle Time; curriculum work in subjects such as RE; charitable work; visiting speakers and the experience of residential trips all promote these values.
- All members of the school community including staff and pupils have a duty to report any concerns that they may have with regard to the safety of each other in general and the safeguarding of children in particular. Concerns should be reported to the Designated Safeguarding Lead (DSL)- in this case the Headteacher or a member of the DSL team in their absence – children may wish to do this through their class teacher or another adult that they feel comfortable with. All concerns, however minor they may seem, will be treated seriously and followed up accordingly (see school Whistleblowing Policy).
- Safeguarding incidents can happen anywhere at any time so all staff should be alert to possible concerns being raised

We require all adults employed in school and helping voluntarily on a regular basis (see school procedures on DBS checking) to have their application vetted through the Disclosure and Barring Service to ensure that there is no criminal record or evidence of offences involving children or abuse. All adults will have a fully enhanced check. It is the school policy, to carry out enhanced checks on all adults working or volunteering in school.

Members of the Governing Body are also expected to gain DBS clearance on their appointment to the GB.

There is a requirement for schools to check the following categories of staff in primary school settings covered by the Regulations (Please see our Childcare Disqualifications checks and procedures Policy for more information) :

- Volunteers
- Contractors/ Agency staff
- Early years provision - staff who provide any care for a child up to and including reception age. This includes education in nursery and reception classes and/or any supervised activity (such as breakfast clubs, lunchtime supervision and after school care provided by the school) both during and outside of school hours for children in the early years age range.
- Later years provision (for children under 8) - staff who are employed to work in childcare provided by the school outside of school hours for children who are above reception age but who have not attained the age of 8. This does not include education or supervised activity for children above reception age during school hours (including extended school hours for co-curricular learning activities, such as the school's choir or sports teams) but it does include before school settings, such as breakfast clubs, and after school provision.
- Staff who are directly concerned in the management of such early or later years provision.

The Regulations refer to employing a person "in connection with" these provisions. The check will apply to the following staff employed in these settings who come into regular contact with children at these ages:

- Nursery and Infant Schools - Staff should be covered if they work directly with children up to Reception age

- Primary and Junior Schools - Staff should be covered if they work directly with children up to Reception age or if they work in before or after school settings with children up to the age of 8

This means staff employed who work in the following roles are not covered by the Regulations and would normally be excluded:

- Staff who only provide education, childcare or supervised activity during school hours to children above reception age; or
- Staff who only provide childcare or supervised activities out of school hours for children who are aged 8 or over; or
- Staff who have no involvement in the management of relevant provision; or
- Staff involved in any form of health care provision for a child, including school nurses, speech and language therapists, education psychologists; or
- Staff such as caretakers, cleaners, drivers, transport escorts, catering and office staff, who are not employed to directly provide childcare

Recruiting procedures and vetting checks for staff and volunteer helpers will follow the requirements laid out by the Disclosure and Barring Service. ([Please see Appendix 7](#))

9.1 School Employees

Staff training will be provided to:

- Ensure that staff are competent and confident in carrying out their responsibilities for safeguarding and promoting children's welfare;
- Ensure staff are aware of how to recognise and respond to safeguarding concerns;
- Support and promote inter-agency training.

All staff will receive Level 1 training, refreshed at least annually. New members of staff receive training as part of their induction to the school (this is led by the DSL/Deputy DSL). The Designated Safeguarding Lead and Deputy undertake Level 3 Training (Working Together to Safeguard Children) refreshed every two years. At the start of each academic year, staff receive any updates to this policy and a refresher in terms of their obligations around safeguarding and the key aspects in ensuring pupils are kept safe.

All staff have received, and signed to confirm they have read and understood, a copy of the document Keeping Children Safe in Education (KCSIE) 2022 along with the Guidance on Safer Working Practices for Adults who work with Children 2019. We expect all staff to follow these guidance documents and be fully aware of their responsibilities. New staff receive these documents as part of their induction.

Staff **must** read the guidance and be clear that:

- The designated safeguarding lead (DSL) and any deputies are most likely to have the complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns;
- As part of the systems within your school which support safeguarding, staff must be aware of:
 - The behaviour policy and safeguarding response to children absent from education
 - The role and identity of the DSL and the safe guarding team;
- If staff have any concerns about a child's welfare, they should act on them immediately
- Staff should speak to your DSL and follow your school's child protection policy if they have concerns about a child;

- The options after staff have spoken to the DSL about a concern include:
 - Managing any support for the child internally via your school's own pastoral support processes;
 - An early help assessment;
 - A referral for statutory services;
- Information sharing is vital to good safeguarding;
- Generally, the DSL takes the lead on early help cases;
- All staff should raise any female genital mutilation (FGM)-related concerns with the DSL or deputy as well as report it to the police;
- Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare ('contextual safeguarding').

9.2 Non School Employees Working in School

A number of non-school employees work in school each week. If they have contact with children, then they should be fully DBS checked. These groups include for example:

- Supply Teachers
- Music Teachers
- Sports Coaches
- Speech and Language Therapists
- Education Psychologists
- After School/lunchtime Club providers (including Fun Zone)
- Behaviour Support Team
- Education Welfare Officer
- Teachers of the Deaf

All of these people are required to demonstrate that they are fully DBS cleared and must present their original disclosure record to the school office to make a note of their details i.e. disclosure number, dates etc. They will also need to present photo identification of who they are (e.g. a passport) which will be checked by a member of staff. Supply teachers from agencies will have their DBS details emailed through prior to their supply day. These details are kept on record and then crossed checked on their arrival. Supply teachers, from the agencies used, are guaranteed to have DBS clearance. Additionally, identification is still required on the morning of their booking prior to contact with the class.

Visitors should read the guidance for visitors (appendix 4) when arriving at school. They will also be presented with Glebe's Safeguarding Information for Visitors' leaflet and an identification lanyard; if they present their DBS clearance certificate on arrival and/or are already on our **Single Central Record they will be given a red lanyard**, if **we do not have sight of their DBS** clearance or details of their DBS number they will be **given blue lanyards**. Visitors who are given a blue lanyard should not be left unattended whilst they within Glebe's school grounds and if found unaccompanied, will be challenged immediately.

While the school endeavors to have no non DBS checked people in school while children are on site, at times this may not be possible e.g. for emergency maintenance work, or work that cannot be completed at any other time such as –

- Technical Support e.g. copier
- A plumbers fixing a leaking tap etc. and other 'one off' contractors

Increasingly contractors who have regular school contracts will have DBS clearance e.g. grounds maintenance, Inspire IT Support, many contractors who are identified through the LA list. In these cases, DBS details are recorded and identification confirmed. In these situations, given there is no direct contact with children, the particular contractors may be able to undertake their duties unsupervised. When contractors are not DBS checked then they will need to be supervised during the course of their visit. This will normally be by the site manager who will also liaise with regard to Health

and Safety issues as necessary. When the school begins to use a contractor on a regular basis the contractor may be asked to gain DBS clearance.

All visiting contractors are issued with the guidance notes on expected conduct while in school ([see appendix 2](#)).

10. Pupils who may be lesbian, gay, bisexual or gender questioning

The section of KCSIE 2025 on gender questioning children remains under review, pending the publication of revised guidance.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Add details of the pastoral support you offer these pupils, such as appointing an LGBTQ+ pastoral lead.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

11) Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- › Is disabled
- › Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- › Is a young carer
- › Is bereaved
- › Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- › Is frequently missing/goes missing from education, care or home
- › Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- › Is at risk of being radicalised or exploited
- › Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- › 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 drugs or alcohol
- › Is suffering from mental ill health
- › Has returned home to their family from care
- › Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- › Is a privately fostered child
- › Has a parent or carer in custody or is affected by parental offending
- › Is missing education, or persistently absent from school, or not in receipt of full-time education
- › Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

11.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Fill in a safeguarding form and tell the DSL as soon as possible if you make a referral directly.

11.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words on the school safeguarding forms. These are located in every classroom as well as in Mel's, Jenny and Hannah's offices. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (if the incident has been reported to you or observed outside of school) and then tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

11.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

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

Any teacher who either:

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

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

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children’s social care as appropriate.

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

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

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

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child’s welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

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

If you make a referral directly (see section 10.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

To refer, the DSL (or member of the safeguarding team) will contact MASH by phoning 01895 556644 and then complete a referral from using the MASH portal.

11.5 If you have concerns about extremism

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system
- The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being radicalised. We will assess the risk of children in our school becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in [section 10](#) of this policy, including discussing their concerns with the DSL.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the safe guarding team and/or seek advice from local authority children's social care. Only if appropriate, you can make a referral to local authority children's social care directly, if appropriate (see '[Referral](#)' above). You must inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

Please refer to our Prevent Policy for more information.

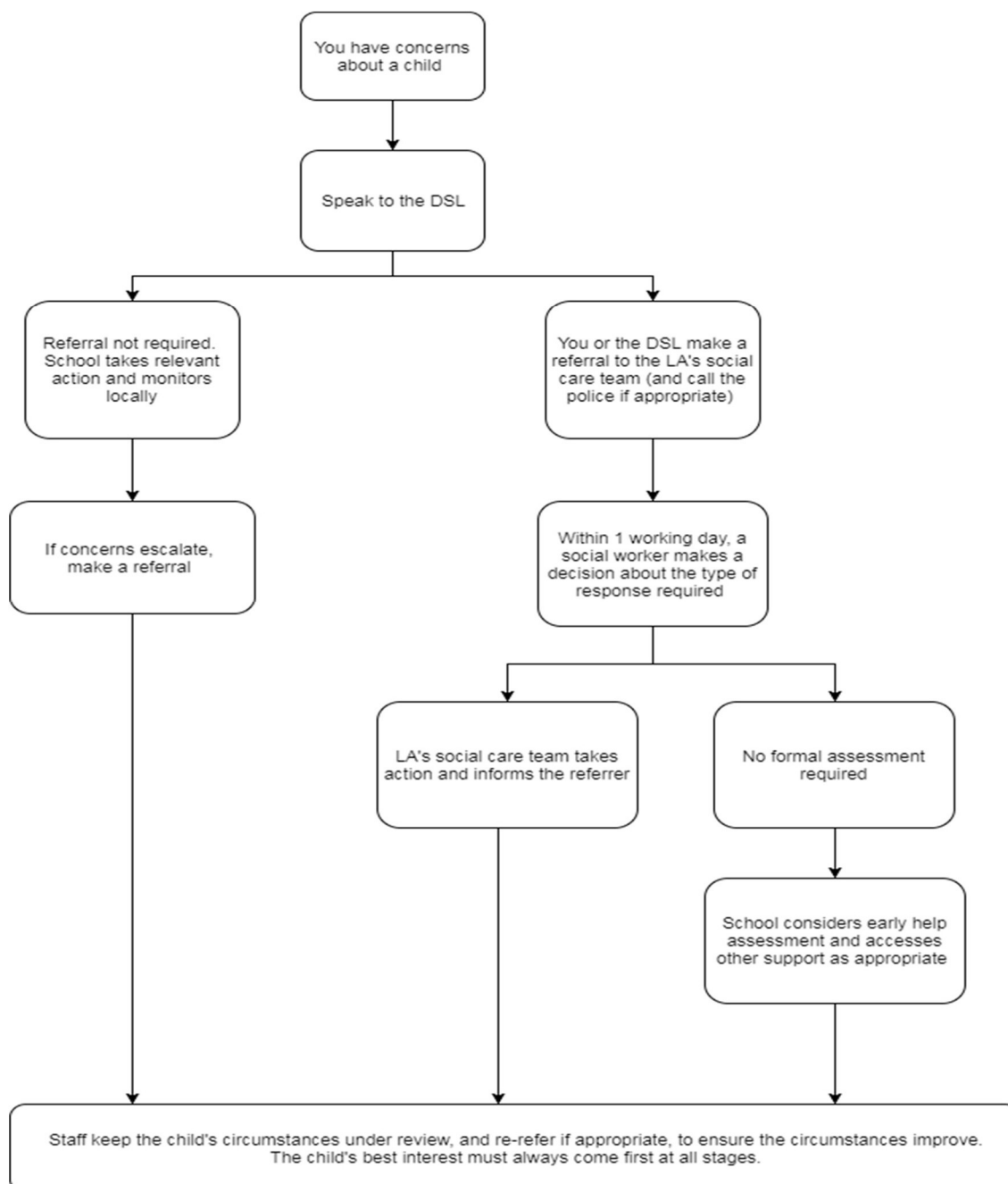
11.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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



11.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

Child on Child abuse can:

- Be motivated by perceived differences e.g on grounds of race, religion, gender, sexual orientation, disability or other difference;
- Result in significant, long lasting and traumatic isolation, intimidation or violence to the victim.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

The different forms of child on child abuse can be (but is not limited to):

- **Bullying (including cyberbullying, prejudice- based and discriminatory bullying);**
- **Abuse in intimate personal relationships between peers;**
- **Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise cause harms;**
- **Sexual violence and sexual harassment;**
- **Consensual and non-consensual sharing of nudes and semi-nude images and/ or videos;**
- **Causing someone to engage in sexual activity without consent, such as forcing someone to strip etc;**
- **Up skirting;**
- **Initiating/ hazing type violence and rituals.**

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

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

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

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

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

- **Challenge any form of derogatory** or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;

- **Be vigilant** to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- Ensure our curriculum helps to **educate pupils** about appropriate behaviour and consent;
- Ensure pupils are able to **easily and confidently report** abuse using our reporting systems;
- Ensure staff **reassure victims** that they are being taken seriously;
- Be alert to reports of **sexual violence and/or harassment** that may point to **environmental** or systemic problems that could be addressed by updating policies, processes and the curriculum or could reflect wider issues in the local area that should be shared with safeguarding partners;
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed;
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;
- Ensure staff are **trained** to understand:
 - How **to recognise** the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening;
 - That if they have any concerns about a child’s welfare, they should act on them **immediately** rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report;
 - A member of staff may overhear a conversation;
 - A child’s behaviour might indicate that something is wrong;
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;
 - That a pupil harming a peer could be a sign that the child is being abused themselves and that this would fall under the scope of this policy;
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it;
 - That they should speak to the DSL if they have any concerns.
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

11.8 Sharing of nudes and semi-nudes (‘sexting’)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that

otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 28 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education programmes.

11.9 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

12) Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

13) Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.. **It is important to recognise that some young people who are being sexually exploited may not exhibit any external signs of this abuse.** Any suspicions should be reported to the DSL immediately.

14) Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

15) Child Criminal Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to

work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and alcohol;
- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education;
- Not taking part in education.

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

16) Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

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

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

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

17) Domestic Abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

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

18) Homelessness

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

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

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

19) Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils;
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges.

These children have consistent adults working with them so that a relationship and trust can be formed. Where children have language difficulties, speech and language programmes are followed and advice from outside agencies is sought to enable the children to be able to communicate any worries they may have.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

20) Looked After Children (CLA)

Looked after children may have a higher level of vulnerability than many of our pupils. Therefore, staff should be particularly vigilant to their needs and understand that many of these pupils may have previously suffered extreme difficulties in their lives. Staff should be aware that CLA may wish to disclose information from a previous period in their lives. We should follow the same procedure for dealing with a disclosure and ensure the DSL is reported to. Staff should be aware of who any CLA are within school.

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

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

We have appointed a designated teacher, [Jenny Griffiths] and deputy [Clare Sheldon] who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

21) Pupils with a Social Worker

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

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

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

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

22) Children Who are Absent From Education

A child who are absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

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

Please refer to our Children Who are Absent from Education Policy and our Absence Policy for more details.

23) Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are 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 member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

24) Precautionary Advice to Staff

There may be times when a member of staff, in the course of duty, uses physical intervention to restrain a child. This should happen only to protect the child, or other children or adults, from imminent injury or danger. The adult involved must report any such incident to H/T or D H/T immediately (see the school policy on physical restraint).

Where possible, staff should avoid situations where they are alone with a child. There will be times when a member of staff needs to be alone with a single child, for example when teaching a child with SEN, or an individual instrumental lesson, or when a child is being dealt with for a pastoral issue or reprimand. In these situations, where possible, staff are advised to conduct the lesson or conversation in a place, which is not isolated from the coming and going of other staff and/or pupils, and to leave the door open so that passers by, can see/hear what is going on. If at any time a member of staff becomes uncomfortable about one to one lessons with a particular child, they should bring the lesson to a close and speak to the Head.

There must always be at least two members of staff on the premises when there are children in the school. The After School Club staffing is organised on this basis, but the same requirement holds true for pupils taking part in extra-curricular activities.

A designated member of staff for safeguarding is available at all times during school operational hours should a member of staff have concerns they wish to discuss.

Physical contact between staff and pupils is permissible but must not be inappropriate. Appropriate behaviour would include staff sitting young children (N – Y1) on their laps or carrying them if they are hurt, upset or tired, or shaking hands with, patting the back of or giving a congratulatory hug to an older child. Inappropriate behaviour would include any kissing or sexual touching, unduly prolonged physical contact or touching a child who was not fully dressed. All staff should restrict physical contact with pupils to an absolute minimum. There should be no physical contact between a member of staff and a pupil if they are alone.

An exception to this may be when treating a pupil who is unwell, injured or has soiled themselves. In these situations the need to tend to the child will generally take precedence. Where, for example, there is a need for more intimate contact such as a child soiling themselves then a second adult should, wherever possible, be present.

Where possible, boys and girls in Years 5 and 6 should change separately and be supervised by staff of the same sex.

All staff should be particularly aware of children with SEN or disabilities. These children may be more vulnerable than their peers so there should be particular attention paid to this group within our school.

Expanded School: As the school continues to expand there is greater scope to miss potential safeguarding issues. It is imperative that all staff remain focussed on being vigilant in all aspects of school life and in ensuring that greater pupil numbers don't impact on ensuring the safety and well-being of all children.

25) Training

All staff will undertake child protection and prevent training as part of their induction process. This will be carried out as soon as possible after they start work at Glebe. The DSL or Deputy DSL will run this training. They will use material from the local authority (LA) or from the London Grid For Learning (LGFL) which outlines the types of abuse and neglect, signs and symptoms to look for and how concerns should be dealt with and reported. The training also includes the school specific procedures on reporting and recording concerns.

All staff will receive an annual update on child protection procedures in school e.g. changes in legislation, to the school policy/procedures) and updates / training continue regularly across the year in the form of training, in staff newsletters and in emails. Members of the Governing Body are offered "update training" regularly- at least once every three years.

The DSL, safeguarding team, safe guarding governor (the chair of governors) and vice chair of governors have undertaken the 'LGFL Safeguarding Children Level 3' training course. A refresher will be undertaken every two years. However, the DSL and safeguarding team will ensure their knowledge and skills are refreshed regularly. The Headteacher, Deputy Headteachers, SENCO, Head of the SRP, Office manager and chair of governors have also all undertaken training in safer recruitment – one of these will always sit on recruitment panels. The school follows the Safer Recruitment and Selection Model Policy devised by Schools Cooperative HR which was updated in September 2019. Lastly, they, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

As part of the school's training package, all staff receive annual training in Prevent so they are aware of the dangers of radicalisation, how to identify potential concerns and the reporting process for any concerns. Again, staff are given regular updates throughout the rest of the year.

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

Volunteers will receive appropriate training, if applicable.

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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

A record of CP training is kept in the school office to ensure all staff are appropriately trained. Visitors to the school e.g. supply teachers are reminded of their responsibility in terms of safeguarding and are made aware of the school's policy and procedures.

26) The Digital Age and Safeguarding

Staff should be familiar with the schools' **GDPR Policy, Staff Code of Conduct, Social Networking Policy and E-Safety policy**. In this digital age we live in there are increasing opportunities for pupils' safety to be compromised. Therefore staff, parents and governors should be very aware of ensuring pupil safety.

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

To address this, our school aims to:

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

26.1 Technology- the 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism; misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology;
 - Keeping personal information private;
 - How to recognise unacceptable behaviour online;
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim;
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year;
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety;
- Ensure parents know that they may take photographs/videos of their own children at school events. However, parents are reminded by the school that, should they include other children, they should not be shared electronically e.g. on social media sites. The same is true of staff in school. All should be very aware that mobile phone technology makes this a very straightforward process and we should all be vigilant to ensure pupil safety. Any concerns should be reported immediately to the DSL.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Phones are not to be out in the classrooms, corridors or playgrounds;
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology;
- Ensure all information should be password protected. This includes using encrypted memory sticks when storing information. All laptops are encrypted but, wherever possible, data should be stored on the school server and minimal information kept on laptops/memory sticks etc. iPads should not have pupil information on them when being taken off site. Likewise, any photographs of pupils should be uploaded to the server so that they can be removed from iPads. iPads are not an appropriate storage device for the long term archiving of photographs. iPads will be cleared of photographs, videos etc each term so should be stored securely prior to this.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones ;
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation 2022](#);
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems;
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community;
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

[26.3 Artificial Intelligence](#)

Glebe Primary School recognises that generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education. We recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website

<https://www.glebe.hillingdon.sch.uk/page/?title=Safeguarding%2C+Complaints+%26amp%3B+Health+%26amp%3B+Safety+Policies&pid=98>

27) Safeguarding the EYFS

27.1 Child Protection and Whistle blowing:

All staff within the EYFS at Glebe Primary School, should report to the DSL any concerns that they may have. All staff are aware of the whole school policy regarding safeguarding and child protection and are reminded of the school's whistle blowing policy regularly throughout the year. All staff are also reminded of the appropriate members of staff to go to where concerns about other members of staff may arise.

During the schools' regular phase meetings teaching staff have the opportunity to discuss any issues that may have arisen within their class during the AOB section of the meeting, they may also highlight any issues brought up by non-teaching staff on their behalf. During these meetings, teaching staff are reminded of current good practice and are then expected to disseminate where appropriate to non-teaching staff. There is new support for whistleblowers who raise concerns about poor or unsafe practice.

27.2 CPD

All staff within the EYFS at Glebe Primary School have equal opportunities to attend CPD training. Staff are reminded that information about EYFS courses can be found through the DHT and the Local Authority website they are also given information about the procedures for booking these. Staff can discuss any training needs or issues during the set up times or at any other appropriate time throughout the working day. Teaching staff can also discuss their own or the staff working alongside them and highlight any training needs during Phase meetings.

During Performance Management observations, all staff's strengths and development points are commented on and opportunities are given to discuss these.

27.3 Mobile phones and cameras within the EYFS

School Cameras and iPads are used within the Foundation Stage to aid in the ongoing assessment of the children within the setting. These photos should remain at school and if being stored on a computer this should be done on the school's secured network. On occasions it will be necessary for staff to take home copies of these photos to complete assessments and use as a tool to help review next steps in learning. On these occasions, staff must save the images onto an encrypted USB stick or other encrypted device, to ensure the security of the images. Staff are not to use their own personal devices to capture images of children. Paper copies of photos taken home for assessment use must be treated responsibly and staff must take all possible steps to ensure that they are secure.

Staff are expected to keep their mobile phones away during the school day and should not have them out when working with the children.

27.4 Staff Ratios

Glebe Primary School will ensure that the staff ratios within the EYFS are in line with statutory guidance provided by the DFE. Any students under the age of 17 will not be included in ratios as stated in the statutory guidance provided.

Staff Ratios will be evaluated on a case by case basis for activities that may increase extra risk. For these activities a full risk assessment will be completed in line with whole school policy.

27.5 Intimate care

Children's privacy during nappy changing and toileting must be considered and balanced with considerations for safeguarding.

27.6 Food

Details of children's food requirements, including allergies and intolerances, must be gathered and shared with all relevant staff. Children must be seated safely when eating within sight and hearing of an adult. At

least one adult in the room must hold a PFA (paediatric first-aid) certificate. Where possible, staff should sit facing children to prevent incidents (including choking) and to be aware of unexpected allergic reactions.

27.7 Role of the Governing Body

The governing body are responsible for monitoring the effectiveness of this policy and the work of the school in ensuring the school keeps its pupils safe. The HT will report to the governing body at each meeting as part of the HT report on Safeguarding and Child Protection issues as appropriate. The DSL will provide an annual report to the Governing Body at the first meeting of the academic year.

27.8 Implementation and Review

This policy will be issued to all staff, who are expected to be familiar with its contents to ensure they are able to implement the policy effectively. The policy will be monitored and evaluated by staff and the governing body on an annual basis or when significant changes are made to national or LA policy or practice. Updates will be made accordingly.

This policy will be available on the school website or from the school office for parents who wish to read it. Updates on school procedures surrounding safeguarding and child protection will be communicated to parents via the school website.

28) Statement of Procedures for Dealing with Allegations of Abuse Against Staff- Including Low Level Concerns

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

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

It applies regardless of whether the alleged abuse took place in the school or not. If there are allegations against a teacher, who is no longer teaching, the historical allegations of abuse will be referred to the police.

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

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

Suspension

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;

- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted;
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for Hillingdon.

28.1 Section 1: concerns that meet the harm threshold

Definitions for outcomes of allegation investigations

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

28.2 Procedure for dealing with allegations

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

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate.

- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate such as union support.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where

this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality

restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

28.3 Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

- A clear and comprehensive summary of the allegation;

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

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

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

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

28.4 Section 2: concerns that do not meet the harm threshold: "Low-Level Concerns".

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority Examples of such behaviour could include but are not limited to:
 - Being overly friendly with children (or particularly cold with children)
- Having favourites
- Taking photographs of children on personal mobile phones
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils
- Having inappropriate banter with either staff or pupils
- Having more “mate” like relationships with pupils rather than professional Unprofessional behaviour that goes against the staff code of conduct.

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the LADO.

If it is determined that the behaviour constitutes a low-level concern:

it should also be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings.

Any investigation of low-level concerns should be done discreetly and on a need-to-know basis;

Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;

In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Any such conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate as may be an action plan or risk assessment.

Some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher should also consider whether this is the case – by referring to the organisation's disciplinary and/or capability procedure and taking advice from school's HR. If the Headteacher considers that the organisation's disciplinary or capability procedure may be triggered, they should refer the matter to HR.

KCSIE states that where a lowlevel concern relates to a person employed by a supply agency or a contractor, that concern should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

Record keeping

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

Records will be:

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

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

References

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

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

28.2 Other complaints

If there any complaints about policies or practices, these should be brought to the complaints coordinator who is the Headteacher. Please refer to our complaints' procedures for further information.

29. Whistle-blowing

If members of staff have concerns with the actions of another employee, please refer to the whistleblowing policy below as to the actions you need to take. Again, these would need to be brought to the Headteacher. If the concern is regarding the Headteacher, then the chair of Governors needs to be contacted.

Aims

- To ensure that employees and volunteers feel confident in raising serious public interest concerns by providing clear avenues through which those concerns can be raised.
- To provide reassurance that those who raise legitimate public interest concerns will not be victimised or punished.
- To ensure that the method of raising such concerns is made clear and to provide for an appropriate response.
-

Introduction

At Glebe, there may be times when staff have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice, health and safety risks to the public or to other employees, damage to the environment, possible fraud or corruption, sexual or physical abuse of clients or any other unethical conduct, it can be difficult to know what to do.

Some staff may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling it's none of their business or that it's only a suspicion. To some, it may feel that raising the matter would be disloyal to colleagues, managers or to the school. There may be times when staff have decided to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. Some staff may also have concerns over harassment or victimisation should they report an issue.

The school is committed to the highest possible standards of openness, probity and accountability. It expects that its employees who have serious concerns about anything that is happening in the school, to come forward and raise those concerns. The school, however, recognises that employees need to be supported and have confidence that any concerns will be treated appropriately. The purpose of this policy, which is based on the Public Interest Disclosure Act 1998, is to enable staff to raise concerns about such malpractice at an early stage and in the right way. The school would rather that the matter is raised when it is just a concern, rather than wait for proof.

This policy applies to all employees of schools and academies.

While this policy refers to "employee" throughout, its principles are intended to apply equally to:

- Contractors working for the school on school premises
- Suppliers
- Casual and agency workers
- Volunteers
- Governors

All groups should have access to the same support and procedures with respect to any whistleblowing concern raised.

This policy is primarily for concerns where the interests of others or of the school itself are at risk. If staff have concerns about their employment with the council this should be raised through the council's Grievance Procedure. The council also has policies to cover the situation where you personally are the victim of bullying or harassment.

Definition of Whistle-Blowing

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but aren't limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staffs' health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

In schools, this can include:

- A misuse of school funds and/or financial malpractice
- Safeguarding concerns with respect to children or any action that negatively affects the welfare of children (see Appendix 1)
- SATS maladministration
- An unauthorised disclosure of confidential information
- Any conduct likely to damage the school's reputation.

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the school count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure which can be found at <https://protect-advice.org.uk/what-is-the-difference-between-raising-a-grievance-and-whistleblowing/>
- A free and confidential advice line <https://protect-advice.org.uk/advice-line/>

What Issues are Covered by Whistleblowing?

Malpractice and wrongdoing will include the following, but the precise coverage and terms used can vary:

- Any unlawful act, whether criminal or a breach of civil law .
- Maladministration, as defined by the Local Government Ombudsman.
- Breach of any statutory Code of Practice.
- Breach of, or failure to implement or comply with Financial Regulations or standing orders.
- Any failure to comply with appropriate professional standards.
- Fraud, corruption or dishonesty.

- Actions which are likely to cause physical danger to any person, or to give rise to a risk of significant damage to property.
- Loss of income to the school.
- Abuse of power, or the use of the school's powers and authority for any unauthorised or ulterior purpose.
- Discrimination in employment or the provision of education.
- Any other matter that staff consider they cannot raise by any other procedure.

Safeguards

1. The school is committed to good practice and high standards and wants to be supportive of employees. The school recognises that the decision to report a concern can be a difficult one to make. If staff raise a genuine concern under this policy, they should have nothing to fear because they will be doing their duty to the school and its community.
2. The school will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect staff when concerns are raised in good faith.
3. Any investigation into allegations of potential malpractice will not influence, or be influenced by, any disciplinary or redundancy procedures that already affect members of staff.
4. All concerns will be treated in confidence and every effort will be made not to reveal an individual's identity if they so wish. At the appropriate time, however, that individual may need to come forward as a witness.
5. Whenever possible, names should be put to your allegation as concerns expressed anonymously are much less powerful. The school will exercise discretion in considering anonymous allegations if the issue raised is sufficiently serious - e.g. involving individual or public safety or corruption, waste or other impropriety - and credible and there is a likelihood of confirming the allegation from other sources.
6. If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the individual who raised concerns. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.
7. The school recognises that the decision to report a concern can be a difficult one to make. Where the employee raises a genuine concern under this policy, they should have nothing to fear as they will be considered as discharging their duty to the school.
8. An investigation into concerns raised under this policy will not influence or be influenced by any formal procedures (e.g. disciplinary or redundancy) that the employee may already be subject to.

Anonymous Allegations

The whistleblower should, whenever possible, put their name to the allegation, as concerns expressed anonymously may be less likely to result in effectively dealing with the concerns raised. Anonymous allegations will be considered at the discretion of the school and will largely depend upon whether the issue raised is sufficiently serious. In exercising their discretion, the factors likely to be taken into account by the school can include:

- Whether the concern involves safeguarding and/or child protection issues
- Whether the concern involves individual or public safety
- Whether the concern involves corruption, waste or other impropriety
- The credibility of the concern
- Whether there is a likelihood of confirming the allegation from other sources.

Confidentiality

All concerns will be treated in confidence and all reasonable efforts will be made to avoid revealing the employee's (whistleblower's) identity if requested by them.

It may not be possible to keep an employee's identity confidential whilst carrying out a thorough investigation and they may need to be identified as a witness at an appropriate time. If it becomes necessary to reveal the employee's identity, they will be informed in writing and of the reasons why it is necessary to identify them.

Untrue or Malicious Allegations

If an employee makes a disclosure which they reasonably believe to be in the public interest, which is not confirmed by the investigation, no action will be taken against them. The outcome will be notified to the employee. The school will deem the matter to be concluded and that it should not be raised again unless new evidence comes to light.

If, however, an employee makes an allegation frivolously, maliciously, vexatiously or for personal gain, disciplinary procedures will apply.

How to Raise a Concern

1. It is normally expected that concerns will be raised in the first instance with an individual's immediate line manager (a member of SLT) or the Head Teacher. However, if the matter is of an extremely sensitive or serious nature, or it is believed that management could be involved, the chair of governors should be approached. The line of contact is as follows:

- Line Manager/ SLT
- Head Teacher
- The Chair of Governors- Mr John Buckingham - 01895 462385 (school office)

These officers will also be able to provide further advice/guidance on how to pursue matters of concern:

- The Monitoring Officer - 01895 250617 (ext. 0617)
- Director of Finance - 01895 556074 (ext. 6074)
- Head of Democratic Services - 01895 250636 (ext. 0636)
- The Chief Executive - 01895 250569 (ext. 0569)
- Concerns can also be addressed to the confidential hotline number on 0800 389 8313 or emailed to fraud@hillingdon.gov.uk

2. Concerns may be raised verbally or in writing. When making a written report, it is suggested that details of the background and history are given, with relevant dates and specific reasons for concern about the situation.

3. Individuals will need to demonstrate to the person contacted that there are reasonable grounds for their concern.

4. Individuals may be accompanied at any meetings or interviews in connection with the concerns they have raised by their trade union or other representative, or a friend. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

External Contacts

The primary aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the employee should not find it necessary to alert anyone externally. However, the school recognises that in some circumstances the employee may not feel able to disclose a matter internally or that it may be more appropriate for them to report their concerns to an external body because, for example:

- The matter is of an extremely sensitive or serious nature or
- The employee believes management to be involved or

- The employee believes the school will cover it up or
- The employee believes the school will treat them unfairly if they complain, or
- Where the employee has raised the matter previously, but the concern has not been dealt with.

Employees are strongly encouraged to seek advice before reporting a concern to anyone external. Advice can be sought from their Trade Union or Citizens Advice.

The school should stress to the employee that if they choose to take a concern outside the school, it is the employee's responsibility to ensure that confidential information, in whatever format, is not disclosed to a third party.

Where a disclosure to an external body is justified and/or necessary, in those circumstances the employee can properly report matters to the following:

- The Local Authority Director of Children's Services
- The Chief Education Officer or equivalent
- The Local Authority Designated Officer (LADO) The school's Diocese or equivalent (for faith schools) <https://www.hillingdon.gov.uk/article/11545/LADO-Contact-Form>.
- Prescribed Person or Body for example:
 - Protect (formerly Public Concern at Work), an independent charity that provides confidential advice on whistleblowing issues: 020 3117 2520 or visit their website at www.pcaw.co.uk
 - Ofsted (whistleblowing helpline): 0300 123 3155 or whistleblowing@ofsted.gov.uk
 - Education & Skills Funding Agency (ESFA): 0370 267 0001 or [ESFA Complaints Procedure](#)
 - Children's Commissioner for England: 020 7783 8330 or info.request@childrenscommissioner.gov.uk NSPCC: 0800 028 0285 or [NSPCC Whistleblowing Advice Line](#).

As a last resort, and provided it is appropriate in all the circumstances, the employee may choose to raise their concern externally to someone other than the prescribed persons/bodies, for example:

- Union or professional association
- The Police
- A Member of Parliament (MP).

It will very rarely, if ever, be appropriate to alert the media. This also carries a risk of disclosing confidential information to unauthorised third parties. If the employee approaches the media, they can expect in most cases to lose their whistleblowing law rights and protection.

How the School will Respond

1. Once a concern has been raised, it will be looked into to assess, initially, what action should be taken.

2. As appropriate, matters raised may:

- be investigated by management/SLT, the Monitoring Officer, internal audit, through the disciplinary process.
- be referred to the police.
- be referred to the external auditor.
- form the subject of an independent investigation.

3. In deciding how to deal with the concern raised, the overriding principle which the school will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures e.g. child protection, will normally be referred for consideration under those procedures. Some

concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

4. **Within ten working days** of a concern being raised, the person, with whom you have raised the concern, will write to you acknowledging that the concern has been received and indicating how the school proposes to deal with the matter. If there is an ongoing investigation, the person responsible for that investigation will provide you with updates on how the matter is progressing and inform you of the outcome of the investigation, subject to any legal constraints.

5. The school will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the school will arrange for you to receive advice about the procedure.

Outcome of the Investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the head teacher, governors and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

30) Record-keeping

We will hold records in line with our records retention schedule.

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

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child. There will also be an electronic copy on CPOMS (**Child Protection Online Management System**.)

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school on CPOMS.

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

To allow the new school to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within

- The first 5 days of the start of a new term

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

31) This Policy Should be Read in Conjunction With:

- Data Protection Policy
- Anti-Bullying Policy
- Health and Safety Policy
- Behaviour Policy
- First Aid Policy
- Children Who Are Absent from Education Policy
- Educational Visits Policy
- Staff Handbook for school procedures on supervision etc
- Staff Code of Conduct
- Activity Risk Assessments

This policy is reviewed annually. All staff at the school and the Governing Body are able to contribute to this policy to ensure that is up to date, relevant and ensures the safety and well-being of all our pupils.

Reviewed: September 2025

To be reviewed: September 2026



Chair of Governors



Safeguarding Referral Form

Staff, volunteers and regular visitors are required to complete this form if they have a safeguarding concern about a child in our school. This **must be done as soon as possible to the time** of the disclosure or the concerning event **and must be submitted on the same day to the designated safe guarding lead: Mel Penney/ or in a member of the safeguarding team: Jenny Griffiths (Deputy DSL)/ Hannah Imane (Deputy DSL)/Clare Sheldon / Joe Dwyer/ Jerushia Connelly in her absence.**

Person making the referral:

Pupil who is being referred:

Date of referral (dd/mm/yy):

Your account of the concern/disclosure – what was said, heard, observed or reported and by whom. If physical, social services need to know when it last happened & where on the body it happened. *(Please record language used verbatim and do not describe language or actions as 'inappropriate':*

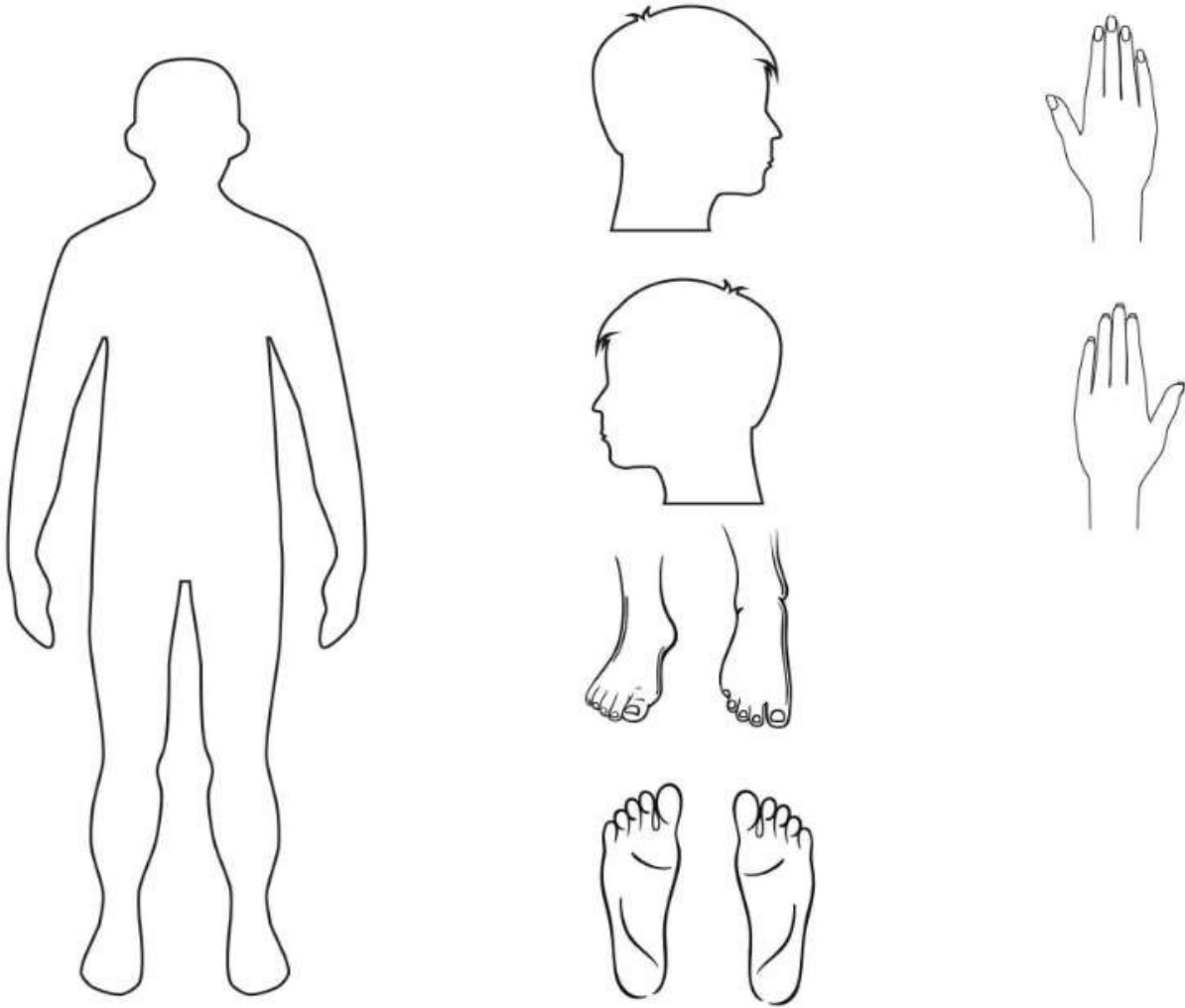
Your response *(what did you say/do following the concern/disclosure?)*

Name:

Signed:

Date:

Body Map



The details that should be included on a child protection body map are:

- Information on who noticed the injury, when they noticed it and what their role is in relation to the child.
- Details of the injury – where it is on the child, what it looks like, its colour, shape, size and condition.
- Details of all visible injuries, even small marks that may not seem of concern at the time.
- In regards to the condition of the injury, is it deteriorating or getting better?
- Is the child in distress or indifferent about the injury?
- Information on any explanations behind the injuries.
- Observations of the child – how are they feeling, what is their behaviour like?
- Information on anything that the child or parent says about the injury.
- Include both a drawing and a written description of the injury.

Time form received by DSL:

Action taken by DSL:

Referred to...?

EWO

Police

M.A.S.H

Children's
Services

Social
Worker

Early Help

Other

Date:

Time:

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

Pastoral team

Teacher

Child

Person who recorded disclosure

Further Action Agreed:

e.g. School to instigate a Family Support Process, assessment by Children's Services

Full name:

DSL Signature:

Date:

Appendix 2: Glebe Primary School - Requirements of Contract Workers

It is important that certain protocols are followed, to ensure the safety and security of the children, and equally to protect the interests of contract workers. False accusations, made against adults by children, can have a devastating effect on the lives of the individuals concerned.

Since they are not employees, and their suitability to work with children has not therefore been checked, contract workers must observe the following protocols. Contract workers:

- are not allowed to have unsupervised access to children (a member of staff – generally the site manager - should always be in attendance)
- must not touch any child, or allow any child to touch them;
- must not give gifts or treats to any child;
- must not exchange any kind of personal information (e.g. phone number) with a child;
- must not allow any close relationship to develop with an individual child or group of children.

Friendly and courteous behaviour is of course appropriate, but care must be taken to ensure that the above protocols are observed.

All adults in school have a responsibility to report any concerns they may have about the well-being or safety of children. If you see or hear anything, however insignificant it may seem, then you have a duty to report it. Concerns should be directed to the Designated Safeguarding Lead (the Headteacher) or the deputy DSL in their absence. Posters are displayed around the school with this information. The school office will be able to direct you in order to make any disclosures.

The school has a full safeguarding and child protection policy a copy of which is available on our school website and in the school office.

Thank you for helping us to keep the children at Glebe safe.

M Penney
Headteacher and Designated Safeguarding Lead

Appendix 3 Record of Meeting

| Pupil Name | DOB | Class/Form |
|-------------------|------------|-------------------|
| | | |

| | | | | | |
|--|--|-------------|--|-------------|--|
| Location of Meeting | | Date | | Time | |
| Reason for Meeting: | | | | | |
| Other professionals present: <i>(include name and job title)</i> | | | Family members & other adults present: <i>(include name and relationship to the child)</i> | | |
| | | | | | |
| Key points discussed: | | | | | |
| | | | | | |
| Agreed actions <i>(include person responsible and timescales):</i> | | | | | |
| | | | | | |
| Date & time of next meeting: | | | | | |
| DSL Name: | | | | | |

Appendix 4: Information to Visitors (including supply teachers, volunteers, visiting professionals)

1. It is essential that you have presented the appropriate credentials, including your DBS clearance, to the school office on arrival.
2. You should ensure that your conduct in school is appropriate at all times. It is important that certain protocols are followed, to ensure the safety and security of the children, and equally to protect the interests of all visitors. False accusations, made against adults by children, can have a devastating effect on the lives of the individuals concerned.
3. To ensure yours and the children's safety please ensure that:
 - You do not find yourself alone with a child other than in an open space e.g. hearing a reader in the corridor
 - You must not touch any child, or allow any child to touch them;
 - You must not give gifts or treats to any child;
 - You must not exchange any kind of personal information (e.g. phone number) with a child;
 - You must not allow any close relationship to develop with an individual child or group of children
4. If you find yourself in a position which is inappropriate, e.g. in a classroom with a child with no other adult present, then you should immediately remove yourself and report to a member of staff or the school office.
5. All adults in school have a responsibility to report any concerns they may have about the well-being or safety of children. If you see or hear anything, however insignificant it may seem, then you have a duty to report it. Concerns should be directed to the Designated Safeguarding Lead (the Headteacher) or the deputy DSL in their absence. Posters are displayed around the school with this information. The school office will be able to direct you in order to make any disclosures.
6. The school has a full safeguarding and child protection policy a copy of which is available on our school website and in the school office.

Thank you for helping us to keep the children at Glebe safe.

M Penney
Headteacher and Designated Safeguarding Lead

Appendix 5 Safe Guarding Leaflet for Visitors

Child Protection

At Glebe, we believe that all learners have the right to be safeguarded from harm and exploitation regardless of:

- Race, religion, preferred language or ethnicity
- Age, gender, sexuality, disability

You may be concerned about:

- Comments made by pupils
- Marks or bruises
- Changes in behaviour, appearance or demeanour
- You have witnessed an incident that causes concern.

Please report these concerns immediately to a member of the Safeguarding Team.

What should I do if a child discloses sensitive information to me?

Recognise:

- Remain calm
- Listen to the pupil – don't prompt
- Do not promise the pupil confidentiality
- Do not make judgements

Record:

- Record details of what was said or seen – verbatim – do not use euphemisms or conjecture
- Record who was present and any other relevant information.

Report:

Report immediately to the DSL or one of the team

Allegations against a member of staff or volunteer

- Immediately inform the Head Teacher of the allegation or concern
- If the allegation is against the Head Teacher, do not discuss it with them, inform the Safeguarding Governor or the LADO (Hannah Ives: hives@hillingdon.gov.uk or 07753 431285).

Our Safeguarding Team



Mrs M. Penney
Designated Safeguarding Lead



Miss J. Griffiths
Deputy DSL



Miss H. Imane
Deputy DSL



Mrs J. Connolly
Inclusion Manager



Mr J. Dwyer
Teacher of The Deaf



Mrs C. Sheldon
Pastoral Support Worker



Mr J. Buckingham
Safeguarding Governor

jbuckingham@glebeprimary.org

Safeguarding Information for Visitors

Guidance for adults visiting or working at Glebe Primary School



Glebe Primary School

Our Commitment to Safeguarding

At Glebe, we are committed to safeguarding and promoting the welfare of children.

Glebe expects all staff, volunteers and visitors to share this commitment.

What are my responsibilities as a visitor?

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. This means that they should consider, at all times, what is in the best interest of the child. (KCSIE 2019)

Visitors are expected to behave in an appropriate manner towards all staff and pupils.

It is important we also take steps to keep ourselves safe. Our actions can sometimes be perceived in a way that is not intended. Here at Glebe Primary School we want to promote safe working practices for everyone within our school community, whatever your role or reason to be here.

Signing in and out

All visitors must sign in at reception. You must include all the information asked of you, including who you are visiting, the time of your arrival and your full name (printed) as well as your signature. Please also remember to sign out when you leave indicating the time. This will help us in the event of a fire so no one is put in danger looking for visitors who have left the premises.

Visitors will be issued with a visitor lanyard. If we have your DBS information and/or you are included on our Single Central Record, you will wear a red lanyard. If you are unable to provide your DBS clearance on your arrival, you will be issued with a blue lanyard and will be supervised by a member of school staff throughout your visit.

Safer Recruitment

We take the safety of our pupils very seriously and therefore make rigorous checks on all new appointments to the school. Specific staff are trained to ensure your vetting procedures are robust and transparent to protect our pupils.

Confidentiality

Confidential or personal information about a pupil or family must never be discussed outside of school or on social media and information shared must be on a need to know basis.



Fire and Evacuation

- The alarm is a continuous bell and the alarms also flash red for our hearing impaired pupils.
- You must leave the building via the nearest safe exit.
- The assembly point is at the far end of the school playground.
- If you are with a member of staff, remain with them and they will escort you to the assembly point.
- Do not take personal risks.
- Do not re-enter the building until you are told it is safe to do so.

Health & Safety

We ask that you always pay attention to your surroundings and, should you have any safety concerns, please report these to the school office.

If, during your visit, you have an accident or feel unwell, please report to the school office who will alert a first aider, who will assist you or seek further help if needed.

The Governing Body regularly reviews Health and Safety matters.

We regularly update our risk assessments.

Our Site Managers are:

Mr A. Budden & Mr T. Young

Our Health and Safety Governor is:

Mr S. Youens

Appendix 6: Brooke's Sexual Behaviours Traffic Lights Tool



Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/rousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

Behaviours: age 5 to 9

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Behaviours: age 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girlfriends/boys who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

Appendix 7) Recruitment and Selection Process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

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

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

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

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

Shortlisting

Our shortlisting process will involve at least 2 people, who have had safer recruitment training, and will:

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information

Safeguarding Policy

- Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview. When seeking references we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities

Safeguarding Policy

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

Regulated activity means a person who will be:

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

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual 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
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

Safeguarding Policy

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

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

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

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

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

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

Schools with pupils aged under 8 add: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

Schools with pupils aged under 8 add: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

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

Safeguarding Policy

Governors:

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

Maintained schools add:

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

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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