*'We can and we will'*

**GLEBE PRIMARY SCHOOL**

# Child Protection & Safeguarding Policy, including Whistleblowing, Allegations Against Staff, Safer Recruitment, including ex-offenders 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**
**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<br>office@glebeprimary.org |
| Safeguarding Team Members | Jenny Griffiths, Hannah Imane, Clare Sheldon, Joe Dwyer | 01895 462 385<br>office@glebeprimary.org |
| Local authority designated officer (LADO) | Hannah Ives<br>Nicole Diamand | LADO Contact Form - Hillingdon Council<br>LADO@hillingdon.gov.uk<br>01895 250975<br>01895 556006 |
| Chair of governors | John Buckingham | 01895 462 385<br>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 (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Maintained schools: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The 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 age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). 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 a specific group of pupils (where we can show it's proportionate). This includes a duty to make 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
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse
- 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
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

***This policy should be read in conjunction with other key safeguarding policies – Supporrting children with medical conditions, behaviour policy, Health and Safety and Special Educational needs policy.***

## 5) Definitions (from Working Together to Safeguard Children)

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- 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** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Making or sharing of nudes or semi-nudes** is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

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

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 an area in the LA area

**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.

## 6) Equality Statement

Some children have an increased risk of abuse, both online and offline, 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 and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- 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 female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)

- Are missing or absent from education for prolonged periods and/or frequently
- 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

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct and Disciplinary Policy the role and identity of the designated safeguarding lead (DSL), Deputy Safeguarding Leads and members of the Safeguarding Team,

the behaviour policy, the e-safety policy as well as and the safeguarding response to children who go missing from education/who are absent from education. Staff will also be aware of the Safeguarding Forms they should complete if they have concerns as well as the time frames to complete this. (Appendix 3)

- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process 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
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- 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, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, 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 safeguarding issues that often overlap and can put children at risk of harm, including:
  - Drug taking and/or alcohol misuse
  - Unexplainable and/or persistent absences from education
  - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
  - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- 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
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 8 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.

Joe Dwyer is the Prevent lead alongside the DSL. The DSL will make sure that staff have appropriate Prevent training.

**Telephone:** 01895 462385

**Email:** office@glebeprimary.org

When the DSL is absent, the Deputy Headteacher, Assistant Head Teacher and Pastoral Support Worker 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;
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school
- 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;
- Ensure that all staff who work directly with children read at least part 1 of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read part 1 of KCSIE
- 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 the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- 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 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 Section 22).

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

Section 19.3 of this policy has information on how governors are supported to fulfil their role.

## 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 22)
- 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 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 5) 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 4).

### 7.6 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 confidentially 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, Data (Use and Access) Act 2025, and the 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);
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving;
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff (See section 26)

## 9) 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:

- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a disability or has certain health conditions and has specific additional needs
- Is a young carer
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- 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
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- 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

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

## 9.1 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 (7.2) if you make a referral directly.

Hillingdon Multi-Agency Safeguarding Hub (MASH) contact details are below:

Children's Safeguarding Referrals: 01895 556006

Adults Safeguarding (Office Hours): 01895 556633 or 01895 556644

Out of Hours Emergencies: 01895 250111

Referrals are made via the portal but a phone call should be placed before using this.
https://pre.hillingdon.gov.uk/stronger-families/hub-information-professionals/2

## 9.2 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. - --
  - When the incident happened?
  - Has it happened previously?
  - Was anyone else present?
- 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 word – do not wait. Safeguarding should always be seen as a priority. Stick to the facts, and **do not** put your own judgement on it. Safeguarding concerns **must** be completed on the correct, peach coloured form. Referrals **should not** be made verbally or via CPOMS. Forms are available in every classroom and are also available from the safeguarding team.

- 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.

### 9.3 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 8 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.

### 9.4 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 9.7, 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 or a member of the Safeguarding 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.

Early help assessments are made through the portal.

**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 9.1), 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 01895556006 or 01895 556644 and then complete a referral from using the MASH portal.***

## 9.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). 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 the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE 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

## 9.6 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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, 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 9.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

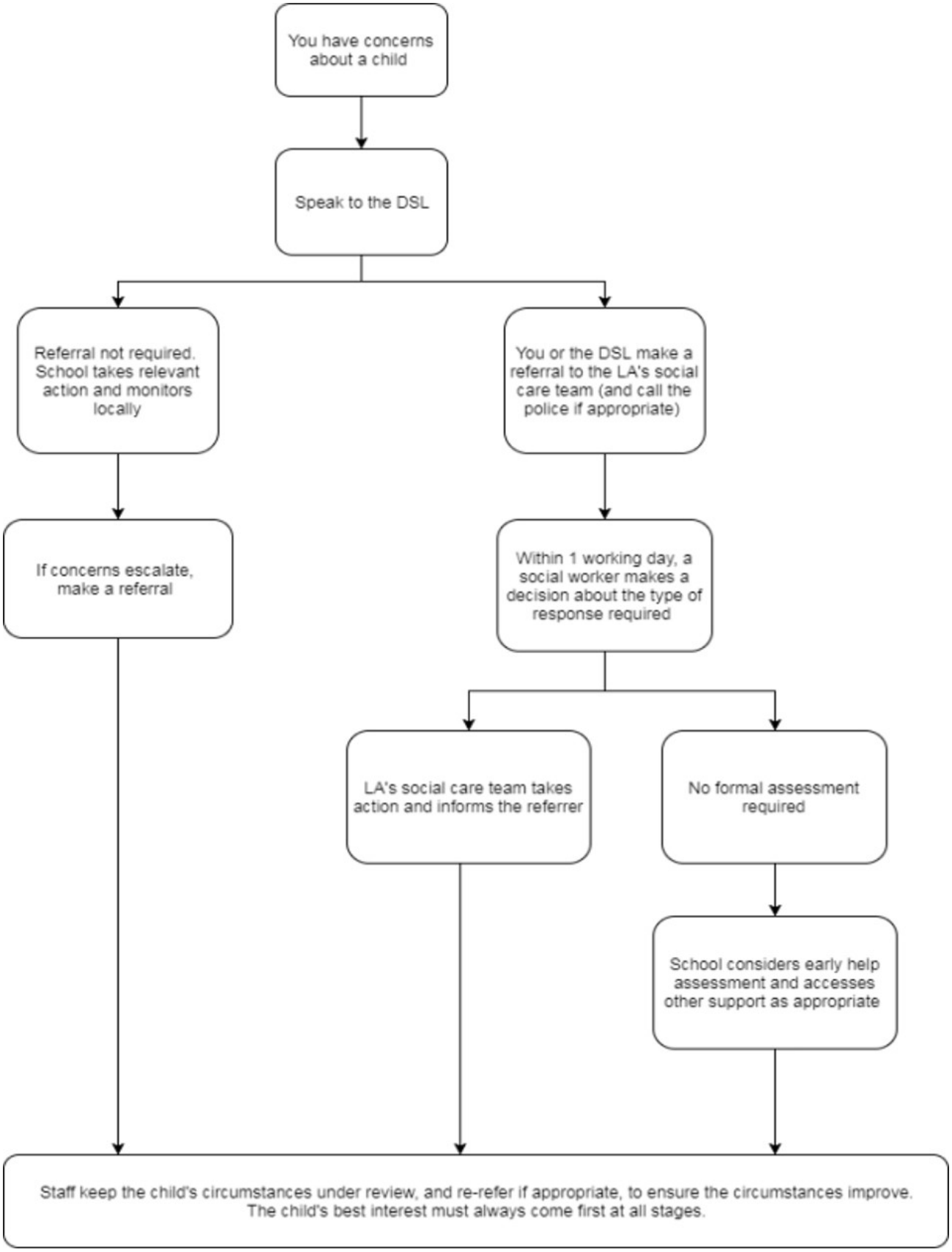
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 10.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

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

At Glebe Primary School the Head Teacher is the Mental Health lead and is supported by the Pastoral Support worker. A number of staff have received Mental Health training. Details of these staff members can be found on the display board outside the library.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**




## 9.7 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);

See appendix 8 for more information about child-on-child abuse.

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

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

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

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;
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment;
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes;
- 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.
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

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

## 9.8 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in Section 26, if appropriate.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

## 9.9 Making or sharing of nudes and semi-nudes

**Your responsibilities when responding to an incident**
All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, 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 23 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. We follow the Jigsaw RSE and PSHE programme.

### 9.10 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- We have posters around the school and in every classroom showing who pupils can report concerns too. We also conduct annual assemblies based around the 'NSPCC Speak out and Stay safe' theme.
- 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

## 10. Online safety and the use of mobile technology

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 (including filtering and monitoring systems) in place 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, including the expectation that our school is a mobile phone-free environment by default.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

**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, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our weekly newsletter. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but not use their mobile phone when children are present.
  - Staff must secure their personal phones. Failure by staff to do so could result in data breaches.
  - 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
- Maintain a mobile free school for pupils. Pupils in year 5 or 6 who bring a mobile phone to school are expected to hand it to the teacher at the start of the day and it will be returned at the end of the day. Smart watches or GPS devices are not allowed and will be confiscated if found.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- 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 e-safety, annually and ensure the procedures and implementation are updated and reviewed regularly

**Using personal mobiles for work purposes**

In some circumstances, it may be appropriate for staff to use personal mobile phones or a similar device during the school day in front of pupils for work. Such circumstances may include, but are not limited to:

- Use of multi-factor authentication
- Emergency evacuations
- Supervising off-site trips
- Supervising residential visits

In these circumstances, staff will:

- Use their mobile phones in an appropriate and professional manner, in line with our staff code of conduct
- Not use their phones to take photographs or recordings of pupils, their work, or anything else that could identify a pupil
- Refrain from using their phones to contact parents/carers. If necessary, contact must be made via the school office

### 10.1 Artificial intelligence (AI)

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.

Glebe Primary School recognises 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 (for example, 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.

Glebe Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE). Staff should only use Microsoft Co-Pilot for school use.

## 11) 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)

## 12) 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 both online and offline. Children with disabilities are 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges as well as risks that they do not understand that what is happening to them is abuse.
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

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.

## 13. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

## 14. Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

Our Pastoral support worker is the primary contact for advice regarding Young Carers and supports pupils known to the school. The Pastoral Support worker is supported by the Deputy Head. Regular information is distributed to parents with advice and support as to how the criteria for young carers as well as how to register their child.

## 15) Looked After Children (LAC) and previously looked after children

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

The Deputy Head teacher , supported by the Pastoral Lead, 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

## 16) 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.

## 17. Pupils who may be lesbian, gay, bisexual

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.

Any concerns should be reported to the DSL

## 18. Pupils who are questioning their gender

### 18.1

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender.

Where this situation may arise we aim to work together with parents and carers to support pupils in an age appropriate way whilst also being aware of the rights of pupils and staff in relation to their religion and belief.

Pupils are not allowed into toilets designated for the opposite biological sex, with no exceptions.

The DSL will lead in these cases.

### 18.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

### 18.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from

the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered

- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

## 19) 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 Missing from Education Policy and our Attendance Policy for more details.***

## 20) Safeguarding the EYFS

We follow Safer Recruitment guidance both within EYFS and the Whole School. Please see the Safer Recruitment Policy (Appendix 2) for further details.

At Glebe Primary School we follow the same procedures in the EYFS as the whole school for recording and monitoring absences. Please see the Attendance Policy for further details.

In the early years pupils may require nappy changing or intimate care. Children's privacy during nappy changing and toileting must be considered and balanced with considerations for safeguarding.

Before a child is admitted to the setting we will obtain information about any special dietary requirements, preferences, food allergies and intolerances that the child has and any special health requirements. This information will be shared with the class teachers and kitchen staff. Parents are responsible for sharing an allergies with our school lunch provider, Dolce, which kitchen staff will monitor when giving meals.

When children are eating in the Early Years they 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.

Before a child is admitted to the setting, the provider must obtain information about any special dietary requirements, preferences, food allergies and intolerances that the child has, and any special health requirements. This information must be shared with all staff involved in the preparing and handling of food. At each mealtime and snack time providers must be clear about who is responsible for checking that the food being provided meets all the requirements for each child. This will be the responsibility of the person giving the food and in the case of children having school dinners, parents are responsible for inputting allergies into the Dolce portal and selecting a suitable meal.

## 21) Training

### 21.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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.

### 21.2 The DSL, Deputy DSLs and the Safeguarding Team

The DSL and deputy DSLs as well as the Safeguarding Team will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

### 21.3 Governors

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.

### 21.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See our safer recruitment policy (Appendix 2) for further information on procedures.

## 22. 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.

### 22.1 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.

## 22.2 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. Please refer to these policies for further information.

## 22.3 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.

## 22. 4 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.

## 22.5 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.

### 22.6 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.

### 22. 7 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) *jbuckingham@glebeprimary.org*

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.

## 22.8 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.

## 22.9 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.

## 22.10 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.

## 23) 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 via 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.

Paper records are stored in locked cupboards in the Headteacher's office. Records on CPOMs are only able to be accessed by designated staff. This includes the DSL and Deputy DSLs. Other staff do not have access to these records.

Information is only shared with other agencies through confidential means.

## 24. Monitoring arrangements

This policy will be reviewed **annually** by the Deputy Head Teacher. At every review, it will be approved by the full governing board.

**25. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- E-safety
- Equality
- Relationships and sex education
- Supporting Pupils with medical conditions and First Aid
- Privacy notices

**26) 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.

## 26.1Section 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.

## 26.2 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.

**26.3Action 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.

## 26.4 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 lowl evel 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

### 26.5 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.

**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: October 2026**
**To be reviewed: October 2027**



**Chair of Governors**

## Appendix 1: Types of abuse

**Abuse is** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

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

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

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Appendix 2: Safer recruitment and DBS checks – policy and procedures**

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
- List the responsibilities and tasks to be undertaken by the post holder.
- Describe the essential and desirable skills, knowledge, qualifications, specific criteria and competencies required to undertake the duties as referred to in the job description/person specification
- State that all applicants are required to complete an application form and that CVs will not be accepted in place of an application form.
- Include reference to the safeguarding responsibilities of the role and whether the post involves regulated activity.
- 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 an Equality and Diversity Monitoring section. Any completed monitoring forms will be separated from the application and not be made available to shortlisting panels.
- 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 and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Ensure the application forms are fully completed.
- Explore all potential concerns, such as history of repeated changes of employment without any clear career or salary progression, or a mid-career move from a permanent post to supply teaching or temporary work.
- 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 may 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
- If they are known to the policy and children's local authority social care and
- If they have been disqualified from providing childcare

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

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

**Seeking references and checking employment history**

We will obtain names and details of referees before interviews and we will gain references before formally appointing a candidate. Any concerns raised will be explored further with referees and taken up with the candidate.

When seeking references we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- 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. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting.
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- 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

- Any disclosures made by the candidate or if the candidate wishes to disclose anything considering the requirement for an enhanced DBS check (with a check of the Barred List) and Childcare Disqualification Requirement check.
- 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.

Any disclosures made by the candidate or if the candidate wishes to disclose anything considering the requirement for an enhanced DBS check (with a check of the Barred List) and Childcare Disqualification Requirement

When appointing new staff, we will:

- check that a candidate taking up a management position, is not subject to a Section 128 direction made by the Secretary of State.
- For Teachers: seek verification of successful completion of statutory induction period (applies to those who obtained QTS after 07 May 1999).

**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
- Conduct an Enhanced DBS and barred list check. Staff are unable to start until the school has completed the Enhanced DBS check, even if they have an existing check from another provider.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

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

- Responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or

- Adding 'moderating a web service wholly or mainly for children' and defining the frequent basis which is on more than 3 days in a 30-day period. I would recommend adding the following link to this section: https://www.gov.uk/government/publications/dbs-guidance-leaflets/regulated-activity-with-children
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

**Induction**

All new staff, volunteers and governors will receive:

- **Safeguarding and child protection training.**
- Information about the Designated Safeguarding Lead (DSL)
- Revelant school safeguarding policies
- KCSIE Part 1 (sent via email)

**Existing staff and volunteers**

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

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; 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

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

**Agency and third-party staff**

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

**Contractors**

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

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

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

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

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

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

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

**Trainee/student teachers**

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

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

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

**Volunteers**

We will:

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

**Governors**

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

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

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

**Staff working in alternative provision settings**

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

**Adults who supervise pupils on work experience**

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

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

**Pupils staying with host families**

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

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

# Appendix 3: Recruitment of ex-offenders

### 1. Introduction

Glebe Primary School meets the requirements for exemption from the Rehabilitation of Offenders Act 1974.
This means that, where a role involves regulated activity, applicants are required to disclose **relevant** convictions and cautions (excluding exemptions – see section 2) if **shortlisted** for employment in our schools.
Roles involving regulated activity will also be subject to an enhanced Disclosure and Barring Service (DBS) check with barred list check, including volunteers.
Having a criminal record will not necessarily bar you from working at our school. The success of your application will depend on your suitability for the job, the nature of the role, and the circumstances and background of any offences.
We are committed to:

- Our duty to safeguard children under:
    - Keeping Children Safe in Education
    - The DBS Code of Practice
    - The Crime and Policing Act 2026
- The fair treatment of all applicants and equality of opportunity

We will notify all potential applicants in advance of the requirement for a DBS check and the potential effect of a criminal record history on the recruitment and selection process and recruitment decision. All applicants for a DBS check will also be made aware of the DBS Code of Practice, and a copy will be provided to them upon request.

### 2. Protections and exemptions

**'Specified offences'** are serious offences involving sexual or violent offending and/or matters relevant to safeguarding children and vulnerable adults. These offences will always be disclosed on a DBS certificate, and should always be included in self-declarations – see the government's list for further details.
It is a criminal offence for any person who is barred from working with children to apply for a position in a school. Glebe will make a report to the DBS and/or the police as appropriate, if it receives an application from a barred person.
**'Protected offences'** are certain old or minor offences that may not be disclosed on a DBS check.
Guidance as to whether a caution or conviction is 'protected' can be found in:

- The Ministry of Justice's Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975
- The government's tool to check whether to disclose cautions or convictions

Applicants **should not** list any 'protected' offences on their self-declaration form, and we will not take them into account if we are made aware of them.

### 3. Responsibilities

3.1 The headteacher
The headteacher will:

- Uphold Glebe's commitment to the fair treatment of all job applicants
- Make sure all job application forms contain clear and relevant information about what cautions or convictions applicants are expected to disclose, and what safeguarding checks the school will carry out and at what stage in the application process

- Make sure staff involved in the recruitment process have received appropriate guidance and training about their legal duties in employing ex-offenders, and assessing the relevance and circumstances of offences
- Ensure that at least 2 people carry out the shortlisting process and participate in interviewing shortlisted candidates, identifying and discussing any employment gaps, inconsistencies or other concerns

3.2 Staff involved in the recruitment process
These staff will:

- Treat applicants fairly, including in relation to any history of offending
- Maintain privacy for applicants, making sure that information about applicants' criminal records won't be seen by anyone outside of the recruitment process
- Make sure that all shortlisted applicants complete a self-declaration form before the interview stage and that all job offers are conditional, subject to appropriate safeguarding checks
- Hold discussions with applicants about their disclosures, where relevant, and make decisions about suitability based on the circumstances and background of offences
- Ensure that shortlisted applicants' references are requested and received in time to allow any identified concerns to be explored further with the referee and taken up with the candidate at interview. The school is responsible for ensuring these references are obtained prior to appointment.
- Seek specialist legal/HR advice where relevant

3.3 All shortlisted applicants
Shortlisted applicants will:

- Familiarise themselves with the requirements for self-disclosure, and whether they have any previous convictions or cautions that must be disclosed
- Complete self-declaration forms honestly and completely, disclosing all required spent and unspent convictions and cautions (excluding 'protected' offences). Applicants will be asked to sign a declaration confirming the information provided is true
- Participate in disclosure discussions following either or both of their self-declaration and DBS check

**4. The process for disclosing and assessing previous convictions**

4.1 Self-declaration
All shortlisted applicants will be asked to complete a self-declaration form and sign the declaration confirming the information provided is true before the interview stage. Applicants must complete these forms accurately and reveal all relevant convictions, as well as any other information that would make them unsuitable to work with children. Failure to reveal any relevant information could lead to the withdrawal of an offer of employment.
All job application forms will include information about this requirement.
Applicants will not be asked for information about previous convictions or cautions before this stage, and any such information that is disclosed before shortlisting stage won't be taken into account in the shortlisting process.
We will handle, store, and process all criminal record information obtained through the disclosure process in accordance with applicable data protection laws, including the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025. This information will only be shared with relevant staff who have a legitimate need to know, retained only for as long as is necessary, and securely destroyed when no longer required.
Self-declaration forms will be reviewed by a staff member who is not involved in making recruitment decisions and any irrelevant information will be deleted; for example, 'protected' convictions that legally can't be taken into account.
Further disclosure discussions (see sub-section 4.3) may be needed following DBS checks. Any offer of appointment will remain conditional until all mandatory pre-employment checks have been completed. The appointment will only be confirmed once staff are satisfied that any previous convictions do not make the successful applicant(s) unsuitable for the role.
4.2 DBS checks

Successful candidates are subject to DBS checks at shortlisting stage and other mandatory pre-employment checks, as set out in statutory guidance, Keeping Children Safe in Education. Staff should consider whether:

- The checks reveal any new information that might prohibit or otherwise make a candidate unsuitable for the role
- The checks match any information disclosed in an applicant's self-declaration

Further disclosure discussions (see sub-section 4.3) may be needed following DBS checks. Any offer of appointment will remain conditional until all mandatory pre-employment checks have been completed. The appointment will only be confirmed once staff are satisfied that any previous convictions do not make the successful applicant(s) unsuitable for the role.

4.3 Disclosure discussions

Where a disclosure or the results of a DBS check reveal that an applicant is barred from the role or ineligible to be employed in that role, their recruitment process will not proceed any further, and they will be informed that they legally cannot be considered for the job. Any decision not to appoint an applicant will be clearly documented to ensure our school can justify its decision, if challenged, in accordance with this policy.

In all other cases, previous convictions will not necessarily prevent applicants from being employed by our school. Staff will determine, with support from HR specialists, whether disclosures warrant a discussion between our school and the candidate.

Where relevant, disclosure discussions will happen as part of the interview process and take the applicant's explanation into consideration. For example, we will consider:

- The seriousness of any offence and relevance to the post applied for
- How long ago the offence occurred
- Whether it was a one-off incident or a history of incidents
- The circumstances around the incident
- Whether the applicant accepted responsibility for their actions

Staff will then assess whether applicants' previous convictions or cautions make them unsuitable for the role.

We will not ask applicants about protected convictions and cautions.

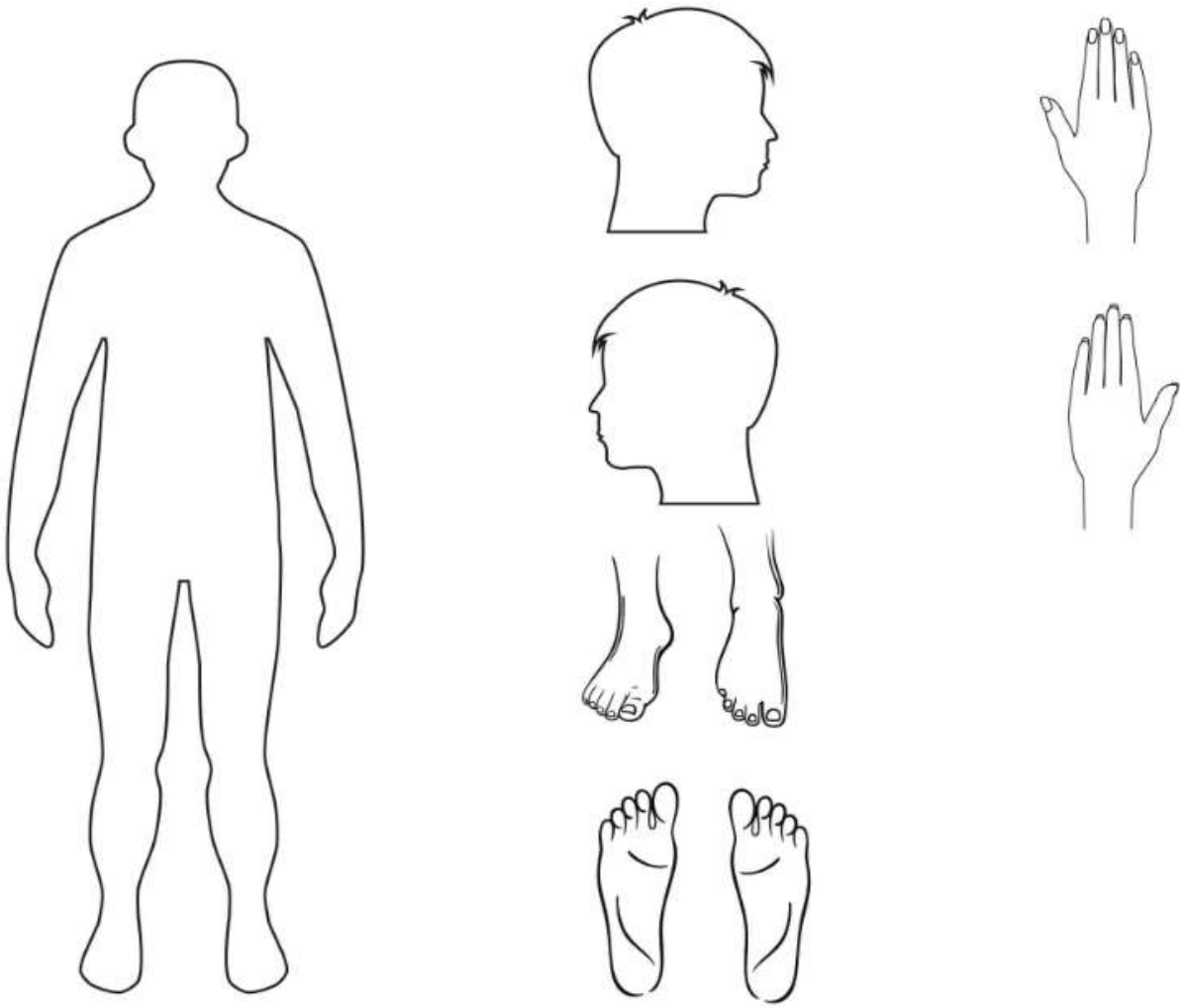
## Appendix 4: Safeguarding Referral Form

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 in her absence.

<table>
<tr><td colspan="2">Person making the referral:<br><br>Pupil who is being referred:<br><br>Date of referral (dd/mm/yy):</td></tr>
<tr><td colspan="2">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’:</td></tr>
<tr><td colspan="2">Your response (what did you say/do following the concern/disclosure?)</td></tr>
<tr><td>Name:</td><td>Signed:</td></tr>
<tr><td colspan="2">Date:</td></tr>
</table>

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 5: 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. Poster 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 6 Information for Visitors

**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 2026)

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 on our InVentry system. You must include all the information asked of you, including who you are visiting. Please also remember to sign out when you leave. 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.

When signing in you will be asked if you have any allergies or medication on you that you may require in an emergency. It is your responsibility to let the office know if you have any emergency medication as to where this is stored.

**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.

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.

**Allergies**

Regular visitors should have had allergy and anaphylaxis training. If you are working directly with children and have not had this training, please let the office staff know.

**Emergency/Spare Medication**

Spare epi-pens are kept in the spare kit in the welfare room. There are 4 emergency epi-pens, 2 0.3ml and 2 0.15ml. Children's prescribed epi-pens are kept in the fluorescent medical bag and are taken as they move around the school building. Spare epi-pens can be used if a child experiences anaphylaxis but does not have a known allergy or if a pupil's AD device misfires.

There are several emergency inhaler kits and these are stored in the emergency boxes in the welfare room, breakfast club, the school hall and the KS2 corridor. These can only be used by children and staff with a prescription if their inhaler has expired, run out or misfired. If someone without a prescription has a suspected asthma attack 999 must be called.

**Fire, Lockdown 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.
- The lockdown alarm is an intermittent alarm to differentiate from the fire alarm. In a lockdown please make your way to the nearest areas with a locked door.

**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 T. Young & Mrs S. Flemming

Our Health and Safety Governor is:

Mr S. Youens

# 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: https://www.hillingdon.gov.uk/LADO-Contact

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## Our Safeguarding Team



Mrs M. Penney
Designated Safeguarding Lead



Miss J. Griffiths
Deputy DSL



Miss H. Imane
Deputy DSL



Mr J. Dwyer
Teacher of the Deaf/SRP Lead



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**
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# Appendix 7: Brooke's Sexual Behaviours Traffic Lights Tool

SEXUAL BEHAVIOURS TRAFFIC LIGHT 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/trousers 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

SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

## 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

SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

## 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 girl/boyfriends 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

### 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.


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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

### Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions 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 be absent or become missing from education, but some children are particularly at risk of becoming missing from education. 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


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- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent 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.

If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.
We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.
Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.
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 absent, such as travelling to conflict zones, FGM and forced marriage.

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

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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


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- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

### Child sexual exploitation

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. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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

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

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

### Child-on-child abuse (including harassment and violence)

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 two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.


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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 cyberbullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents)
- 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)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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 making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, 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 nude or semi-nude 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 if 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.

### 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.


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Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. 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 notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

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

### Homelessness

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

The DSL 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 local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

#### FGM

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


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

Indicators that FGM has already occurred include:

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

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

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


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- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

**Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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 fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **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 becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.


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We will assess the risk of children in our school from 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 the 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 social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

### Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.


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Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt


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- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

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

### Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries


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- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

### Checking the identity and suitability of visitors

All visitors will have an identify badge. Staff members wear a black lanyard with staff written on it. Visitors with an enhanced DBS wear a red lanyard meaning they can be unaccompanied in the building. Visitors without an enhanced DBS wear a blue lanyard and can not be left unaccompanied at all – a member of staff will be with them at all times. All visitors signed in through our InVentry system. All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)


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We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### Non-collection of children

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

- Contact the emergency contacts listed on SIMs.
- If parents have not collected by the time of school closure Social Services will be contacted.

### Missing pupils

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

- Call the police immediately and follow advice.


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