Child Protection and Safeguarding Policy

Furze Platt Senior School: a company limited by guarantee. Registered Office: Furze Platt Road, Maidenhead, Berkshire, SL6 7NQ
Registered in England: Company Number 7834715

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1. Legal Framework

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

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

1.1. Legislation

- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Crime and Policing Act 2026

1.2. Statutory guidance

- DfE (2024) 'Working together to safeguard children'
- DfE (2026) 'Keeping children safe in education'
- DfE (2015) 'The Prevent duty'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2015) Special educational needs and disability code of practice: 0 to 25 years
- DfE (2024) Working together to improve school attendance
- Restrictive interventions, including use of reasonable force, in schools (2026)

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- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2026)

1.3. Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- HM Government (2018) 'Information sharing'
- Home Office (2015) 'Preventing youth violence and gang involvement'
- Home Office (2018) 'Criminal Exploitation of Children and Vulnerable Adults - County Lines Guidance'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2022) Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement
- DfE (2022) Behaviour in schools
- DfE(2022) Meeting digital and technology standards in schools
- DfE (2022) Cyber security standards for schools and colleges
- DfE (2020) Keeping children safe in out-of-school settings: code of practice

1.4. Other relevant school policies include:

- Anti-Bullying Policy
- Cyber-Bullying Policy
- Behaviour For Learning Policy
- Curriculum Policy
- Data Protection Policy
- Drugs Policy
- Equalities Policy
- Suspension & Exclusions Policy
- Grievance & Discipline Policy
- E-Safety Policy
- Relationships & Sex Education Policy
- Staff code of conduct

2. Policy Statement & Principles

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safer children make more successful learners;
- this policy will be reviewed annually.

2.1. Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff and governors and are consistent with

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those of the Windsor & Maidenhead Safeguarding Partnership.

2.2. Policy principles

- Welfare of the child is paramount;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- Students and staff involved in child protection issues will receive appropriate support.

2.3. Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the school's commitment with regard to child protection to students, parents and other partners.

3. Terminology

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment, abuse or neglect. This includes both within and outside the home as well as 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 so as to enable those children to have optimum life chances and to enter adulthood successfully.
- Providing help and support to meet the needs of children as soon as problems emerge.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

Child refers to all young people who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

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

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

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

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

For the purposes of this policy, **"upskirting"** refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both pupils and teachers), and any gender, can be a victim of upskirting.

For the purposes of this policy, **"sexting"** is defined as the sharing between pupils of sexually explicit content, including indecent imagery.

For the purposes of this policy, **"indecent imagery"** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

For the purpose of this policy, **"child-on-child**" abuse is defined as abuse between children. This can include, but is not limited to the following:

- Abuse within intimate partner relationships
- Bullying (including cyberbullying)
- Sexual violence and sexual harassment
- Physical abuse and physical harm
- Sexting
- Initiation/hazing-type violence and rituals

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

This policy also contains a number of acronyms used in the education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in 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.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage, increased status or other advantage of the perpetrator or facilitator.

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DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHCP	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	A procedure where the female genital organs are injured or changed and there is no medical reason for this.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage, and practices such as breast ironing.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
ITT	Initial teacher training	A programme of training to achieve qualified teacher status.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.

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LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equalities Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
QTS	Qualified teacher status	A requirement in England to work as a teacher of children in state schools and special schools.
RSE	Relationships and sex education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for.

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4. Roles & Responsibilities

Key personnel:

The Designated Safeguarding Lead (DSL) is Laura Lewis (Deputy Headteacher)
Contact details: email: laura.lewis@furzeplatt.net tel: 01628 625308 x127

The Senior Deputy Designated Safeguarding Lead (SDDSL) is:
Rebecca Lake (Deputy Headteacher)
Contact details: email: Rebecca.Lake@furzeplatt.net tel: 01628 625308 x122

The Deputy Designated Safeguarding Leads (DDSL) are:

Key Stage	Head of Key Stage	Year	Head of Progress	Pastoral Manager
3	Andrew Wyles (Assistant Headteacher) andrew.wyles@furzeplatt.net 01628 625308 x492	7	Nic Jones nicolas.jones@furzeplatt.net 01628 625308 x295	Jemma Barney jemma.barney@furzeplatt.net 01628 625308 x144
		8	Samuel Bates samuel.bates@furzeplatt.net 01628 625308 x245	Beth Harper beth.harper@furzeplatt.net 01628 625308 x164
		9	Charlotte Ridgley charlotte.ridgley@furzeplatt.net 01628 625308 x191	Larna Barney larna.barney@furzeplatt.net 01628 625308 x417
4	James Dollery (Assistant Headteacher) james.dollery@furzeplatt.net 01628 625308 x133	10	Ben Corbett ben.corbett@furzeplatt.net 01628 625308 x356	Megan Josh megan.josh@furzeplatt.net 01628 625308 x145
		11	Chris Gill chris.gill@furzeplatt.net 01628 625308 x359	Sasha Gumbs sasha.gumbs@furzeplatt.net 01628 625308 x151
5	Pete Ging (Assistant Headteacher) peter.ging@furzeplatt.net 01628 625308 x601	12	Mark Wedge Mark.wedge@furzeplatt.net 01628 625308 x607	Mary Pasa mary.pasa@furzeplatt.net 01628 625308 x603
		13	Amy Palocsai Amy.Palocsai@furzeplatt.net 01628 625308 x 304	

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DDSL for SEND	Bethan Stiles (Assistant Headteacher) Bethan.stiles@furzeplatt.net 01628 625308 x 441

The Designated Teacher for Looked After Children is Laura Lewis (Deputy Headteacher)
Contact details: email: laura.lewis@furzeplatt.net tel: 01628 625308 x127

The Prevent Lead is Laura Lewis (Deputy Headteacher)
Contact details: email: laura.lewis@furzeplatt.net tel: 01628 625308 x127

The Senior Mental Health Lead is Laura Lewis (Deputy Headteacher)
Contact details: email: laura.lewis@furzeplatt.net tel: 01628 625308 x127

The nominated safeguarding governor is Diane Flood
diane.flood@furzeplatt.net

The Headteacher is Dr Andrew Morrison
Tel: 01628 625308

Due to their day-to-day contact with students, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to the signs of abuse and understand the procedures for reporting their concerns.
School staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
As required by law, the school has a senior member of staff to coordinate child protection arrangements. The local authority maintains a list of all designated senior persons (DSLs) for child protection.

The Governing Body ensures that there is a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, the Governing Body should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.
Overall, the Governing Body ensures that the school:

- complies with its duties under the above child protection and safeguarding legislation;
- policies, procedures and training opportunities are effective and comply with the law at all times;
- contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children (2018);
- complies with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions;
- has effective child protection policies and procedures in place together with a staff code of conduct;

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- has a governor responsible for safeguarding arrangements;
- has appointed a member of the Senior Leadership Team (SLT) to the role of DSL as an explicit part of the role-holder's job description;
- has appointed one or more deputy DSLs to provide support to the DSL, and ensured that they are trained to the same standard as the DSL and that the role is explicit in their job description(s);
- teaches students about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum;
- reviews the standards of filtering and monitoring systems on school devices and networks to support the school in meeting safeguarding standards in this area;
- adheres to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required;
- ensures that staff members are appropriately trained to support students to be themselves at school, e.g. if they are LGBTQ+;
- guarantees that volunteers are appropriately supervised;
- makes sure that at least one person on any appointment panel has undertaken safer recruitment training;
- ensures that all staff members receive safeguarding and child protection, including Prevent, training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually;
- has procedures in place to handle allegations against members of staff or volunteers;
- has procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned;
- has procedures in place to handle students' allegations against other students;
- has appropriate disciplinary procedures in place, as well as policies pertaining to the behaviour of students and staff;
- has systems in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse;
- makes sure that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students;
- maintains systems for students to express their views and give feedback;
- appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training;
- ensure that the designated teacher works with the virtual school head to discuss how the student premium funding can best be used to support LAC;
- introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities;
- ensures that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the student's legal status, contact details and care arrangements;
- ensures that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly;
- has in place appropriate safeguarding responses for students who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future;
- ensures that all members of the governing board have been subject to an enhanced DBS check;
- nominates a member (normally the Chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Headteacher.
- be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

An annual report will be submitted to the local authority about how the governing body's duties

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have been carried out. Any weaknesses will be rectified without delay.

The Headteacher:

- ensures that the child protection policy and procedures are implemented and followed by all staff;
- allocates sufficient time and resources to enable the DSL and DDSLs to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- provides all staff, upon induction, with the Child Protection & Safeguarding Policy, Staff Code of Conduct, part one of the Keeping Children Safe in Education (KCSIE) (2026) guidance, Behaviour Policy, the safeguarding response to children who go missing from education, online safety training, and the identity of the DSL and DDSLs;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- ensures that students' safety and welfare is addressed through the curriculum.

The Designated Safeguarding Lead (DSL):

- refers all cases of suspected abuse to children's social care services (CSCS), the LA designated officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed;
- refers cases of radicalisation to the Channel programme;
- liaises with the Headteacher to inform him of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaises with the DDSLs to ensure effective safeguarding outcomes;
- acts as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies;
- understands the assessment process for providing early help and intervention;
- supports staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate;
- keeps cases of early help under constant review and refers them to the CSCS if the situation does not appear to be improving;
- has a working knowledge of how LAs conduct a child protection case conference and a child protection review conference, and be able to attend and contribute to these effectively when required to do so;
- ensures each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures, including during the staff induction process;
- is alert to the specific requirements of children in need, including those with SEND and young carers;
- keeps detailed, accurate and secure records of concerns and referrals;
- records reasons for safeguarding decisions taken;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- works with the governing body to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly;
- ensures the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals;
- links with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding;
- references NPCC - When to call the police guidelines in order to maintain best practice when working with safeguarding partners;
- ensures that a student's child protection file is copied when transferring to a new school;
- is available at all times during school hours to discuss any safeguarding concerns;
- holds the details of the LA personal advisor and liaises with them as necessary.

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- has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- Oversees the management of school filtering and monitoring systems on both school devices and networks, reviewing these annually, to ensure effective safeguarding.
- acts as the Prevent Lead for the school and in doing so ensures appropriate training, risk assessments and procedures are in place for the school.
- The DSL will ensure that a confidential shared mailbox is accessible for the DSL and DDSL's to ensure continuous safeguarding care. This is safeguarding@furzeplatt.net. CPOMS is also monitored by all DSL/DDSLs.

The Deputy Designated Safeguarding Leads are appropriately trained and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the Deputy Headteacher / DSL, the Deputy Headteacher / DDSL will assume all of the functions above.

All staff are expected to:

- safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties;
- know the names and roles of the DSL, DDSLs and members of the safeguarding team;
- read, understand and comply with the school's child protection policy;
- have read 'part one' of 'Keeping Children Safe in Education 2026';
- deal with any bullying incidents, including cyber-bullying, that may occur, following proper procedures;
- refer e-safety concerns;
- be aware of local Early Help provisions and processes;
- be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful;
- be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments;
- behave in accordance with our staff conduct policy as per the Staff Handbook.

5. Multi-Agency Working

5.1. The school contributes to multi-agency working as part of its statutory duty;

5.2. The school will work with the three safeguarding partners of CSCS/LA, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to multi-agency plans to provide additional support;

5.3. The school recognises the importance of information sharing between professionals and local agencies in order to effectively meet students' needs;

5.4. In the case of child death, the school will work, as appropriate, with the three local safeguarding partners and the Pan Berkshire Child Death Overview Panel.

5.5. In light of the above, staff members are aware that whilst the GDPR places a duty on schools to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the student being placed at risk of harm;

5.6. Staff will not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They will be mindful that early information sharing is vital for effective identification, assessment and allocation of

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appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan). Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR). DPA and GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or DDSL. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

5.7. The school also recognises the particular importance of multi-agency working in identifying and preventing child sexual exploitation (CSE) and child criminal exploitation (CCE).

5.8. Schools have a key role in multi-agency sharing information about children, including attendance, exclusions, and concerns about abuse, neglect or exploitation

6. Good Practice Guidelines

To meet and maintain our responsibilities towards students we need to agree standards of good practice. Good practice applies to all staff and includes:

- treating all students with respect;
- setting a good example by conducting ourselves appropriately;
- involving students in decisions that affect them;
- encouraging positive and safe behaviour among students;
- being a good listener;
- being alert to changes in students' behaviour;
- recognising that challenging behaviour may be an indicator of abuse;
- reading and understanding the school's Child Protection and Safeguarding Policy and guidance documents on wider safeguarding issues, for example bullying, physical contact and information-sharing;
- asking the student's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language;
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.

7. Opportunities To Teach Safeguarding

Topics from e-safety to anti-bullying are covered in ICT and PSHE lessons.

In accordance with DfE statutory guidance - Relationships Education, Relationships and Sex Education (RSE) and Health Education (June 2019) the school delivers Relationships & Sex Education through PSHE lessons across Key Stages 3 & 4. See the Relationships & Sex Education Policy. The school follows and has been compliant with the statutory RSE guidance since before it became compulsory in September 2020: The 2026 RSE statutory guidance is the school's basis for RSE.

8. Abuse Of Trust

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for

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a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

9. Children Who May Be Particularly Vulnerable

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

9.1. To ensure that all of our students receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs;
- living in a domestic abuse situation;
- affected by parental substance misuse;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- live transient lifestyles;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language.

9.2. Children may need a social worker due to any of the above safeguarding or welfare needs. This may be part of a Section 17 (Child in Need) or Section 47 (Child Protection) plan.

9.3. The LA is required to share the fact a child has a social worker as a matter of routine. The DSL and safeguarding team hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

10. Looked After Children (LAC) & Previously Looked After Children

10.1. The most common reason for children becoming Looked After is as a result of abuse and/or neglect. The Designated Teacher supports staff to ensure they have the skills, knowledge and understanding to keep Looked After Children safe.

10.2. The Designated Teacher and appropriate staff hold the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They also hold information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her, including details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

10.3. The school recognises that a previously looked after child potentially remains vulnerable. When supporting LAC and previously LAC, the school works with all partner agencies to ensure prompt action is taken when necessary to safeguard these children.

10.4. The Designated Teacher has received appropriate training and has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

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11. Alternative Provision

11.1. Whilst numbers are small, the school fully recognises that students in Alternative Provision often have complex needs. We work closely with all AP settings to ensure they are aware of the additional risk of harm that these students may be vulnerable to.

When working with Alternative Provision, the school follows DfE statutory guidance:

- Alternative provision - DfE Statutory Guidance
- Education for children with health needs who cannot attend school - DfE Statutory Guidance

11.3 The school undertakes the following safeguarding measures for AP and remains responsible for the safeguarding of our students whilst they are at AP;

- Undertakes an annual Quality Assurance visit and written report of each provider
- Receives a letter of assurance from the provider confirming they have undertaken DBS and wider safer recruitment and safeguarding checks of anyone working at their provision.
- Facilitates a Service Level Agreement between the provider and the school
- Monitors the attendance of young people at each AP
- Monitors the progress of young people at each AP
- Undertakes a half-termly safeguarding visit of each AP
- Ensures the setting is suitable for the needs of the individual pupil
- Records the address of the Alternative Provider and any sub-contracted provision or satellite sites the child might attend.

11.4 Should any safeguarding concerns arise, the placement will be immediately reviewed and terminated if necessary, unless or until those concerns have been satisfactorily addressed.

11.5 The DSL retains responsibility and final sign off on the use of any Alternative Provider. Those providers who are not deemed to have satisfactory policies and practices will not be commissioned.

11.6 The school is aware of the voluntary national standards for Alternative Provision, and utilises this guidance when Quality Assuring APs.

12. Early Help

12.1. Early help means providing support as soon as a problem emerges, at any point in a child's life.

12.2. Any student may benefit from early help, but in particular staff will be alert to the potential need for early help for students who:

- are disabled and have specific additional needs;
- have SEND (whether or not they have a statutory EHC plan);
- have a mental health need;
- are young carers;
- show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- are frequently missing/going missing from care or from home;
- are at risk of modern slavery, trafficking, sexual or criminal exploitation;
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- are misusing drugs or alcohol themselves;
- are returned home to their family from care;
- show early signs of abuse and/or neglect;
- are at risk of being radicalised or exploited;
- are privately fostered;
- have a family member in prison, or is affected by parental offending;
- are at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- are persistently absent from education.

Commented [KD1]: spelling - change to working

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- have experienced multiple suspensions, is at risk of being permanently excluded from schools.

12.3. Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.
12.4. All staff will be made aware of the local early help process and understand their role in it. Targeted early help services delivered through Family Help are coordinated by a local authority and/or their partners to address specific concerns within a family. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Targeted early help may be appropriate for children and families who have multiple and or complex needs. It is a voluntary approach, requiring the family's consent.
12.5. The DSL or a DDSL will take the lead where early help is appropriate.

13. Children potentially at greater risk of harm

Whilst all children should be protected, the school recognises (and reflects in our policies and procedures) some groups of children are potentially at greater risk of harm.

14. Support For Those Involved In A Child Protection Issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (DSL or DDSL) who will keep all parties informed and be the central point of contact;
- nominating separate link people for the child and member of staff, where a member of staff is the subject of an allegation made by a student, to avoid any conflict of interest;
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

15. Complaints Procedure

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures which can be found in our **Complaints** policy and **Grievance & Discipline** policy**.**

16. If You Have Concerns About A Colleague

Staff who are concerned about the conduct of a colleague (including supply staff and volunteers) towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The **Raising Concerns at Work (Whistleblowing)** policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher. Complaints about the Headteacher should be reported to the Chair of Governors.

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17. Staff Who Are The Subject Of An Allegation

When an allegation is made against a member of staff (including supply staff and volunteers), set procedures must be followed (See Appendix 3). It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

Commented [KD2]: should we refer to disciplinary policy here for investigation process? Including making the LADO aware? or just refer to appendix 3

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Where an allegation is substantiated and the individual is dismissed or resigns, the school has a legal duty to consider referring the matter to the Teaching Regulation Agency (TRA) for consideration for a prohibition order.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, the school may report this concern to CSCS.

Allegations against staff should be reported to the Headteacher. Allegations against the Headteacher should be reported to the Chair of Governors (see Appendix 2.) All investigations into allegations will follow the guidelines in Part 4 of Keeping Children Safe in Education (2026) and, where required, the school Disciplinary Policy.

18. Staff Training

18.1. The Governing Body ensures that **all** staff undergo safeguarding and child protection training (including online safety) at induction. The training is regularly updated. Induction and training should be in line with advice from the local three safeguarding partners.

The induction training will cover:

Commented [KD3]: should we add specifically all staff receive Level 2 CP & S iHasco certified online learning? and Leadership and pastoral managers (and others) receive level 3?

- the Child Protection and Safeguarding Policy;
- the Behaviour Policy;
- the staff code of conduct
- the safeguarding response to children who go missing from education
- the identities and roles of the DSL and deputy DSLs
- L2 Safeguarding Training
- L3 Safeguarding Training for DSL/DDSL

18.2. All staff members will also receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

18.3. Annual safeguarding updates (and induction) will cover, at a minimum:

- the issues surrounding sexual violence and sexual harassment;
- contextual safeguarding;
- the vulnerabilities of LAC and PLAC;
- the Prevent Agenda;
- female genital mutilation;
- honour based violence;
- child criminal exploitation
- understanding roles and responsibilities in relation to filtering and monitoring of school devices and networks

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

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18.5. The DSL will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.
18.6. The DSL will undergo online safety training to help them recognise the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support students with SEND to stay safe online
18.7. Online training will also be conducted for all staff members as part of the overall safeguarding approach.
18.8. The Governing Body recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity is therefore provided for staff to contribute to and shape safeguarding arrangements and the child protection policy.
18.9. The Governing Body will ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, including online safety, that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach.
18.10. Whilst considering the above training requirements, the Governing Body should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and requires teachers to have a clear understanding of the needs of all students.

19. Safer Recruitment

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

- 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
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

The full legal definition of regulated activity is set out in 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.

Regulated activity includes:
a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight.83 Some activities are always regulated activities, regardless of frequency. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

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Regulated activity will not be: paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.

Regulated activities also include providing guidance on physical, emotional or educational wellbeing as well as driving a vehicle only for children.

Staff should liaise with the DSL prior to confirming any contracting, volunteering or work experience posts.

19.1. Pre-employment checks

19.1.1. The governing board will ensure suitability of prospective employees is assessed by:

- verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available. Copies of such documents will be kept on staff personnel files;
- obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity. Should the school choose to retain a copy this will be done in compliance with the Data Protection Act 2018, there will be a valid reason for doing so and it will not be kept for longer than six months;
- use the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks
- verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role. Checks are also undertaken via an Occupational Health provider;
- checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed;
- if the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed;
- checking professional experience, QTS and qualifications as appropriate using Teacher Services;
- confirming that an individual taking up a management position is not subject to a section 128 direction using the DfE's Individuals prohibited from managing or governing schools
-
- As part of the shortlisting process, the school will consider online searches as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. The school will inform short-listed candidates that online searches will be carried out.

19.1.2. An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

19.2. Internal candidates

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

19.2.2. References from internal candidates will always be scrutinised before appointment.

19.3. ITT candidates

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

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

19.4. Governors

19.4.1. Enhanced DBS checks will be completed on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

19.4.2. Associate members may be appointed by the governing body to serve on one or more committee. DBS checks are not mandatory for associate members.

19.4.3. Follow safer recruitment protocols by meeting nominees and receiving references.

19.5. Those who have lived or worked outside of the UK

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

19.6. Barred list check

19.6.1. An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

19.6.2. If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if he/she has worked in regulated activity in the three months prior to appointment.

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

19.7. References

19.7.1. References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

19.7.2. References will only be accepted from a senior person and not from a colleague.

19.7.3. References will be sought on all short-listed candidates, with their consent, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

19.7.4. References will be obtained, with the candidate's consent, prior to interviews taking place and discussed during interviews.

19.7.5. Open testimonials will not be considered.

19.7.6. Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

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

19.8. Volunteers

19.8.1. No volunteer will be left unsupervised with a student or allowed to work in regulated activity until the necessary checks have been obtained.

19.8.2. An enhanced DBS certificate with barred list check will be obtained for all volunteers in regulated activity.

19.8.3. Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting washing, bathing and dressing for reasons of age, illness or disability.

19.8.4. The school will request new DBS certificates for volunteers every 3 years.

19.8.5. Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. School staff must accompany any guest visitors (for example those delivering assemblies) at all times, if an enhanced DBS has not been seen by the DSL or HR team.

Commented [KD4]: follow safer recruitment protocols including meeting nominees and receiving references

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19.9. Contractors

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

19.9.2. Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

19.9.3. Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

19.9.4. DBS checks will be undertaken for those who contact as self-employed also.

19.10. Adults who supervise children on work experience

19.10.1. Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm. The school uses Unifrog to track and ensure that relevant health and safety and liability documentation has been provided. Employers without such documentation, who are legally required to have it, will be unable to host work experience placements.

19.10.2. If the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight, this is a regulated activity. Placements will not be approved beyond the 3 day school placement. In exceptional circumstances the school will consider approving a longer work experience placement provided the correct DBS and barred list checks have been undertaken.

19.10.3. Other individuals in the workplace who are not involved in teaching, training, instructing or caring for or supervising the child on a work experience placement or activity are not in regulated activity.

19.10.4. Schools and colleges are not able to request that a work experience provider obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience but would do so for pupils under the age of 16, provided the placement is over 3 days or overnight.

19.10.5. Where a pupil over 16 is involved in work experience on the school site, they themselves may require a DBS check. The role they will be undertaking will be assessed by the DSL to understand whether they will be directly supervised by staff at all times, or whether a DBS check is required in line with regulated activity requirements.

19.11. Visitors

19.11.1. Visitors can include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. They may also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events.

19.11.2. Visitors to the school should always come via the school reception where appropriate checks and lanyard allocation will be made. This allows clear indication and discussion as to whether the visitor must be escorted by staff at all times.

19.11.3. Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration should be given to the suitability of any external organisations. Staff should speak to the DSL about any queries regarding visitors due to attend site.

19.12. Data retention

19.12.1. DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

19.12.2. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

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19.13. Referral to the DBS

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

19.13.2. Where the school dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Teaching Regulation Authority (TRA).

20. Single Central Record (SCR)

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

20.2. All members of the proprietor body are also recorded on the SCR.

20.3. The following information is recorded on the SCR:

- an identity check;
- a barred list check;
- an enhanced DBS check;
- a prohibition from teaching check;
- a section 128 check;
- a Welsh Check;
- a Medical Check;
- online Checks
- a check of professional qualifications;
- a check to determine the individual's right to work in the UK;
- additional checks for those who have lived or worked outside of the UK

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

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

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

21. Use Of School Site By Outside Organisations And Off-Site Arrangements

Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. The same applies for the Leisure Centre. The vast majority of these events occur outside school hours. When events run during school hours detailed planning is carried out before the event can proceed.

The school retains safeguarding responsibilities if we receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children. As with any safeguarding allegation, the school will follow our safeguarding policies and procedures, including informing the LADO.

When our students attend off-site activities, we will check that effective child protection arrangements are in place.

22. Photography & Images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.
To protect students we will:

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- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- ensure students are appropriately dressed
- encourage students to tell us if they are worried about any photographs that are taken of them.

The staff code of conduct outlines further requirements of staff if taking photographs of students; for example to appear in the school newsletter.

23. E-Safety

Mobile phones and computers are a source of fun, entertainment, education and access to social media. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations online, webcam filming, photography or face-to-face meetings. The school's **E-Safety** and **Social Media** policies explain how we try to keep students safe in school. Furze Platt is a phone free school and pupils are required to secure their mobile phones in Yondr pouches upon entering the school site each day,.

Cyber-bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This whole school approach to online safety empowers us to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and students do not have access to these during the school day. We will take seriously issues that arise from their use out of school, but may advise that the school is not the appropriate agency to deal with such issues.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk (The 3Cs):

23.1.1. **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

23.1.2. **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes. This may include generative AI.

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

23.1.4. **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

23.2. The DSL,IT Strategy Manager and Senior Leadership Team ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role

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and responsibilities of the designated safeguarding lead and any parental engagement. In addition, the school will ensure that appropriate levels security protection procedures are in place to safeguard systems, staff and learners.

23.3. Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.
The school will also make it clear to parents what their children are being asked to do online for school.

23.4 Filtering and monitoring

The school uses Smoothwall to filter and monitor on school devices and networks. This is in line with the Department for Education's filtering and monitoring standards and Generative AI: product safety expectations.

The DSL and IT Network manager will review the effectiveness of filtering and monitoring systems at least annually. Records will be kept of these reviews.

23.5 Artificial Intelligence

Filtering and monitoring are used to support online safety when using EduTech systems. AI is now a significant part of pupils' digital experience and the relevant risk including deepfakes, misinformation and disinformation and harmful content should be monitored. It is also important that staff and students recognise the associated risks of imputing personal data into AI tools. When considering the use of EduTech platforms, the IT Manager and DSL will consider any potential risks in line with the Department for Educations Generative AI: product safety standards (2026)

23.6 Cyber Crime

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded,
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead should consider referring into the Cyber Choices programme.

24. Recognising Abuse & Neglect

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

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24.1.1. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.
24.1.2. All school staff, particularly the DSL and DDSLs, will always consider whether children are at risk of abuse or exploitation in situations outside their families – this is known as contextual safeguarding. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
24.1.3. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.
24.1.4. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
24.1.5. The school will provide as much contextual information as possible when making referrals to CSCS
24.1.6. The DSL will ensure all staff are aware of the neglect and exploitation.
24.1.7. The DSL will ensure all staff are aware that abuse may also include children causing harm to adults, known as 'child to parent' or 'care giver' abuse.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

24.2. Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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.

24.3. Physical 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.

24.4. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may include verbal abuse such as criticism, name-calling or belittling. It may feature age – or developmentally – inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

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

24.5. Sexual abuse

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Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

24.6. Neglect

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 misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-givers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

24.7. Indicators of abuse – what you might see

All staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead, or deputy.

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated senior person.

It is the responsibility of ALL staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;

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- be involved in, or particularly knowledgeable about, drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

24.7.1. While many signs of abuse will be physical, All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

24.8. Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All students and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures. To allow or condone bullying may lead to action taken under child protection procedures.

24.9. Children missing and absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a warning sign to a range of safeguarding issues including neglect, child abuse, child sexual and child criminal exploitation. The school will robustly respond to persistently absent pupils to help prevent the risk of them becoming a child missing in education in the future. Where such pupils are already known to local authority children's social care the school will assess the impact being absent from education may have on known safeguarding risks within the family or community,

A child missing from education for eight sessions or more is also a potential indicator of abuse and neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Should a child go missing from school (education) the Attendance Officer will inform the DSL and contact the Educational Welfare service; the DSL will consider further actions/support should it be required. We will inform the LA of any student admission or a student removed from our roll within five days using the Statutory Notification of Admission/Deletion online form, so that the LA can identify and safeguard children missing from education.

For a parental decision to electively home educate we will complete the Notification of parental decision to electively home educate.

The school will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

24.9.1. Admissions register

- Students are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the student will first be attending;
- The school will notify the LA within five days of when a student's name is added to the admissions register;
- The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur;
- Two emergency contact details will be held for each student where possible;

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- Staff will monitor students who do not attend the school on the agreed date and will notify the LA at the earliest opportunity;
- If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:
  - The full name of the parent with whom the student will live;
  - The new address;
  - The date from when the student will live at that address;
- If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
  - The name of the new school;
  - The date on which the student first attended, or is due to attend, that school;
- Where a student moves to a new school, the school will use the internet system school2school to securely transfer students' data.
- In order to ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:
  - have been taken out of the school by their parents/carers, and are being educated outside the national education system, e.g. home education;
  - have ceased to attend the school, and no longer live within a reasonable distance of the premises;
  - have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
  - have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period;
  - have been permanently excluded.
- The school will also remove a student from the admissions register where the school and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.
- If a student is to be removed from the admissions register, the school will provide the LA with the following information:
  - The full name of the student;
  - The full name and address of any parent with whom the student lives;
  - At least one telephone number of the parent with whom the student lives;
  - The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable;
  - The name of the student's new school and the student's expected start date there, if applicable;
  - The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended);
- The school will work with the LA to establish methods of making returns for students back into the school.
- The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.
- The school will also highlight any other necessary contextual information including safeguarding concerns.

24.10. Students on the child protection register or for whom we have child protection concerns

The number of students on a child protection plan varies. There are also other students about whom we have child protection concerns who are not on a child protection plan. We support students in various ways by:

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- following the guidance set out in any child protection plans
- ensuring they know and are comfortable about whom they can approach for help or if they have specific concerns
- monitoring their welfare carefully, including talking to them regularly about their well-being
- attending any child protection meetings held on their behalf, including speaking on their behalf at such meetings should they request it
- monitoring their attendance carefully and reporting any unexplained absence to social care, and where threshold is met, the Education Welfare Officer.
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- enlisting the support of and liaising with other agencies as appropriate
- checking that they have access to all elements of school life, including visits and other activities
- informing their Head of Progress that they are on a CPP without breaching confidentiality so he/she knows to register immediately any concerns however minor with the DSL (or a DDSL).

24.11. Allegations of abuse against other students (child-on-child abuse)

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Child- on -child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Timely, evidence-based support can be key for prevention.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour, including any known online sexual behaviour, should speak to the DSL or DDSL as soon as possible.

It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

24.12. Types of child-on-child abuse

24.12.1. Abuse in intimate personal relationships between children / peers

- All staff need to be aware that any of the behaviours listed below can and do happen between peers who are within a relationship, not just between disparate parties. This type of abuse is sometimes known as 'teenage relationship abuse'.

24.12.2. Bullying (including cyberbullying).

24.12.3. 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).

24.12.4. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

24.12.5. Sexual harassment

- Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

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If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment includes:

- Sexual comments;
- Sexual "jokes" and taunting;
- Physical behaviour, such as deliberately brushing against another student;
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

24.12.6. Sexual violence

- Sexual violence refers to the three following offences:
  - Rape: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents;
  - 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.

24.12.7. Harmful sexual behaviours

- The term harmful sexual behaviour is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:
  - using sexually explicit words and phrases;
  - inappropriate touching;
  - sexual violence or threats;
  - full penetrative sex with other children or adults;
  - sexual interest in adults or children of very different ages to their own;
  - forceful or aggressive sexual behaviour;
  - compulsive habits;
  - sexual behaviour affecting progress and achievement;
  - using sexually explicit words and phrases;
  - inappropriate touching;
  - sexual violence or threats;
  - full penetrative sex.
- Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not).

  HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. 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. Furze Platt has a zero tolerance approach to HSB and staff should report any concerns via CPOMS.

24.12.8. Misogyny

Staff should be alert to and report any concerns relating to misogyny, due to the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence.

24.12.9. Upskirting

Typically involves taking a picture under a person's clothing without them knowing, with

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the intention of viewing their genitals to obtain sexual gratification or cause the victim humiliation, distress or alarm.

24.12.10. 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, regardless of a person's willingness to participate.

24.13. Managing and preventing child-on-child abuse

24.13.1. A preventative approach

- In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.
- The school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
  - Healthy relationships;
  - Respectful behaviour;
  - Gender roles, stereotyping and equality;
  - Body confidence and self-esteem;
  - Prejudiced behaviour;
  - That sexual violence and sexual harassment is always wrong;
  - Addressing cultures of sexual harassment
- Students are allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

24.13.2. Awareness

- Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- All staff will be aware that students of any age and sex are capable of abusing their peers and will never tolerate abuse as "banter" or "part of growing up".
- All staff will be aware that child-on-child abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff will be made aware of the heightened vulnerability of students with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student's SEND and will always explore indicators further.
- LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children. The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
- Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

24.13.3. Support available if a child has been harmed, is in immediate danger or at risk of harm

- If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.
- Within one working day, a social worker will respond to the referrer to explain the action that will be taken.
- Support available if early help, section 17 and/or section 47 statutory assessments are appropriate

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- If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

24.13.4. Support available if a crime may have been committed

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

24.13.5. Support available if reports include online behaviour

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

24.13.6. Managing disclosures

- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team, one of the Pastoral Managers or Heads of Progress and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible (following the flow chart in Appendix 1).
- Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.
- If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.
- Where an alleged incident took place away from the school or online but involved students from the school, the school's duty to safeguard students remains the same.
- All staff will be trained to handle disclosures. Effective safeguarding practice includes:
  - Never promising confidentiality at the initial stage.
  - Only sharing the report with those necessary for its progression.
  - Explaining to the victim what the next steps will be and who the report will be passed to.
  - Recognising that the person the child chose to disclose the information to is in a position of trust.
  - Being clear about boundaries and how the report will be progressed.
  - Not asking leading questions and only prompting the child with open questions.
  - Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
  - Only recording the facts as the child presents them – not the opinions of the note taker.

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- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

- The DSL will be informed of any allegations of abuse against students with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the student in mind at all times.

24.13.7. Confidentiality

- The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.
- The DSL will consider the following when making confidentiality decisions:
  - Parents will be informed unless it will place the victim at greater risk.
  - If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
  - Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.
- The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

24.13.8. Anonymity

- There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.
- When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

24.13.9. Risk assessment

- The DSL or a DDSL will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.
- Risk assessments will consider:
  - The victim(s).
  - The alleged perpetrator(s).
  - Other children at the school, especially any actions that are appropriate to protect them.
- Risk assessments will be recorded (either on paper or electronically) and kept under review.

24.13.10. Taking action following a disclosure

- The DSL or DDSL will decide the school's initial response, taking into consideration:
  - The victim's wishes.
  - The nature of the incident.
  - The ages and developmental stages of the children involved.
  - Any power imbalance between the children.
  - Whether the incident is a one-off or part of a pattern.
  - Any ongoing risks.

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- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

- Immediate consideration will be given as to how to support the victim(s), alleged perpetrator(s) and any other children involved.
- For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator(s) will be removed from any classes shared with the victim. The school will consider how to keep the victim(s) and alleged perpetrator(s) apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator(s).
- For reports of sexual violence and sexual harassment, the proximity of the victim(s) and alleged perpetrator(s) and the suitability of shared classes, premises and transport will be considered immediately.
- In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration. Special consideration will of intra familial harms and any necessary support for siblings following incidents will also be taken.

24.13.11. Managing the report

- The decision of when to inform the alleged perpetrator(s) of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator(s).
- There are four likely outcomes when managing reports of sexual violence or sexual harassment:
  1. Managing internally
  2. Providing early help
  3. Referral to CSCS
  4. Reporting to the police
- Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.
- The following situations are statutorily clear and do not allow for contrary decisions:
  - A child under the age of 13 can never consent to sexual activity.
  - The age of consent is 16.
  - Sexual intercourse without consent is rape.
  - Rape, assault by penetration and sexual assault are defined in law.
  - Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

24.13.12. Managing internally

- In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.
- Providing early help
- The school may decide that statutory interventions are not required, but that students may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

24.13.13. Referral to CSCS

- If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.
- The school will not wait for the outcome of an investigation before protecting the victim and other children.

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- The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment and/or safety plan will be used to inform all decisions.
- If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.
- If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

24.13.14. Reporting to the police

- Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator(s) is/are under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSL and DDSLs will follow RBWM processes for referral.
- Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.
- The DSL and Headteacher will agree, in consultation with the police and CSCS, what information will be disclosed to staff and others, in particular the alleged perpetrator(s) and their parents. They will also discuss the best way to protect the victim(s) and their anonymity.
- The DSL will be aware of local arrangements and specialist units that investigate child abuse.
- In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

24.13.15. Bail conditions

- Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.
- The school will work with CSCS and the police to support the victim(s), alleged perpetrator(s) and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.
- The term 'released under investigation' (RUI) is used to describe alleged perpetrator(s) released in circumstances that do not warrant the application of bail.
- Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim(s) can continue in their normal routine and continue to receive a suitable education.
- The school will work with Police to produce a safety plan to support students on site (whether the alleged or the victim)

24.13.16. Managing delays in the criminal justice system

- The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim(s), alleged perpetrator(s) and other children. The associated risk assessment will be used to inform any decisions made.
- The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

24.13.17. The end of the criminal process

- Risk assessments and/or safety plans will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator(s) remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator(s), including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.
- The school will ensure that the victim(s) and perpetrator(s) remain protected from bullying and harassment (including online).
- Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim(s) and alleged perpetrator for

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as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.

- The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

24.13.18. Ongoing support for the victim

- Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:
  - The terminology the school uses to describe the victim
  - The age and developmental stage of the victim
  - The needs and wishes of the victim
  - Whether the victim wishes to continue in their normal routine
  - The victim will not be made to feel ashamed about making a report
  - What a proportionate response looks like
- Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.
- Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.
- The school will provide a physical space for victims to withdraw to.
- Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies, including CAMHS.
- Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.
- If the victim is unable to remain in the school,a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.
- If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

24.13.19. Ongoing support for the alleged perpetrator(s)

- When considering the support required for an alleged perpetrator, the school will take into account:
  - The terminology they use to describe the alleged perpetrator or perpetrator.
  - The balance of safeguarding the victim and providing the alleged perpetrator(s) with education and support.
  - The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
  - Their age and developmental stage.
  - What a proportionate response looks like.
  - Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.
- When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.
- If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.
- The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the student understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.
- The National Organisation for the Treatment of Abusers (NOTA) provides support for professionals involved in work with, or related to, sexual offending.

24.13.20. Disciplining the alleged perpetrator(s)

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- Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.
- The school will make such decisions on a case-by-case basis, with the Headteacher and DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.
- The school will also consider whether circumstances make it unfair or irrational for the school to make a decision about what happened while an investigation is considering the same facts.
- Disciplinary action and support can take place at the same time.
- The school will be clear whether action taken is disciplinary, supportive or both.

24.13.21. Shared classes

- Once the DSL has decided to progress a report, they will again consider whether the victim(s) and alleged perpetrator(s) will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the student will always come first.
- Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator(s) will be removed from classes with the victim(s) and potential contact on school premises and transport will be risk assessed via a safety plan.
- Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator(s) to remain in the school would harm the education or welfare of the victim(s) and potentially other students.
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator(s) will remain at the school, the school will keep the victim(s) and perpetrator(s) in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim(s), will inform any discussions made.
- Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim(s) and alleged perpetrator(s) will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.
- In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim(s) will always be at the heart of the process.

24.13.22. Working with parents and carers

- In most sexual violence cases, the school will work with the parents of both the victim(s) and alleged perpetrator(s). For cases of sexual harassment, these decisions will be made on a case-by-case basis.
- The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.
- Schools will also meet with the parents of the alleged perpetrator(s) to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The Headteacher and/or DSL will attend such meetings, with agencies invited as necessary.
- Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

24.13.23. Safeguarding other children

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

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- It is likely that children will “take sides” following a report, and the school will do everything in its power to protect the victim(s), alleged perpetrator(s) and witnesses from bullying and harassment.
- The school will keep in mind that contact may be made between the victim(s) and alleged perpetrator(s) and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- As part of the school’s risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator(s). Schools will consider any additional support that can be put in place.

24.14. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Children and young people are often unwittingly drawn into CSE and/or CCE through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation.

CSE and CCE are serious crimes and can have a long-lasting adverse impact on a child’s physical and emotional health. It may also be linked to child trafficking.

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school has adopted the following procedure for handling cases of CSE & CCE, as outlined by the DfE:

Identifying cases

School staff members are aware of and look for the key indicators of CSE/CCE; these are as follows:

- Going missing for periods of time or regularly going home late
- Regularly missing lessons
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol

Referring cases

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL or a DDSL. Where CSE/CCE, or the risk of it, is suspected, local safeguarding procedures will be triggered, including referral to the LA.

Support

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

The school includes the risks of sexual exploitation in the PSHE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

The DSL and some DDSLs will have undertaken child sexual exploitation awareness training.

24.15. County lines criminal activity

24.15.1. County lines criminal activity refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns. County lines activity is a clear form of CCE and frequently involves CSE;

24.15.2. Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs;

24.15.3. Staff members who suspect a student may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL;

24.15.4. The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

24.15.5. All staff are trained about the associated risks of county lines activity in accordance with the DfE's 'Criminal Exploitation of Children and Vulnerable Adults - County Lines' (Sept 2018) guidance document.

24.16. Domestic abuse

24.16.1. Domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional;

24.16.2. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. They may also suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result;

24.16.3. The school is registered with Operation Encompass, with all key safeguarding staff receiving information about recorded incidents.

24.17. Female Genital Mutilation (FGM)

24.17.1. For the purpose of this policy, "**female genital mutilation**", commonly referred to as FGM, is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. FGM is a surprisingly common form of abuse in the UK, and the school does have measures in place to safeguard against this type of abuse. Any indications that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy.

24.17.2. In support of this provision, the school will do everything that it can to ensure that:

- the school is an 'open environment', where students feel able to discuss issues that they may be facing;
- the DSL and DDSLs are aware of the issues surrounding FGM;
- materials explaining FGM and the issues that surround it are available for staff and students;
- advice and signposts are available for accessing additional help, e.g. the NSPCC's helpline, ChildLine services, and appropriate black and ethnic minority women's groups;

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- girls have access to a private telephone, should they wish to use it;
- training about FGM is incorporated in the school's safeguarding training.

24.17.3. If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- not to reveal to anyone other than the DSL that their enquires might be related to FGM, as this could increase risk to the student;
- not to engage initially with the student's parents or family, or others within the community;
- to alert the school's DSL to their concerns. This member of staff will then relay concerns to social care, who will inform the police if they need assistance. If a student has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the student's wishes;

24.17.4. School staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

24.17.5. Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so it is important for staff to be sensitive when broaching the subject.

24.17.6. Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society;
- Any girl with a mother or sister who has been subjected to FGM;
- Any girl withdrawn from PSHE.

24.17.7. Indicators that may show FGM could take place soon include the following:

- The risk of FGM increases when a female family elder is visiting from a country of origin;
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman';
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk;
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent.

24.17.8. It is important that staff are vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

24.17.9. Indicators that FGM may have already taken place include the following:

- difficulty walking, sitting or standing;
- spending longer than normal in the bathroom or toilet;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- prolonged or repeated absences from school followed by withdrawal or depression;
- reluctance to undergo normal medical examinations;
- asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine students, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

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

All forms of HBV are forms of abuse and will be treated and escalated as such.
Staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV, or has already suffered from HBV, and will activate local safeguarding procedures if concerns arise.

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24.18. Honour-based abuse

'Murder, violence or abuse in the name of so-called honour' are murders/violence/abuse in which, predominantly females, are killed/harmed/abused for actual or perceived immoral behaviour, which is deemed to have breached the honour code of a family or community, causing shame. They are sometimes called 'honour killings/violence'. There is, however, no honour in murder/violence. The honour code means that women must follow rules that are set at the discretion of male relatives and which are interpreted according to what each male family member considers acceptable.

24.18.1. Breaking the rules is seen as destroying the good name of the family, and is deserving of punishment at the discretion of male relatives. Honour is an unwritten code of conduct that involves loss of face on someone's part if offended against, especially in groups where loyalty is considered paramount. Honour Based Abuse cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, honour-based abuse may exist.

24.18.2. Signs:

- withdrawal of student from school by those with parental responsibility;
- student being prevented from attending higher education;
- truancy or persistent absences;
- request for extended leave or student not returning from an overseas visit;
- surveillance by siblings/cousins/extended family members at school;
- decline in behaviour, engagement, performance or punctuality, poor exam results – in particular for previously motivated student;
- decline in physical presentation or demeanour.

24.19. Serious Violence

Serious violence is a key safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

All staff are made aware of key indicators that may signal that children are at risk from, or are involved in, serious violent crime.

24.19.1. These indicators may include:

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

Unexplained gifts or new possessions should be noted to the DSL as they could indicate that a child has been approached by, or are involved with, individuals associated with criminal gangs or networks.

24.19.2. All staff are trained about the associated risks of serious violence

24.19.3. Staff are trained to recognise that sexual abuse is often committed by those previously known to the victim.

24.19.4. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team via CPOMS. The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action to risk assess and protect pupils.

24.19.5. If staff have reason to believe a pupil has a weapon on them they should immediately contact callout on Ext 147 to alert Senior Leaders. SLT will assess whether searches, police contact or enacting a lockdown are necessary to ensure the safety of pupils.

24.19.6. Staff are aware that risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of

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offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).

24.19.7. Evidence shows that early, evidence-based support for those at risk, helps to reduce the risks of serious violence.

24.19.8. Staff should be aware of local context regarding serious violence. In our context, the proximity to London puts the area at risk of County Lines and the associated risk of violence.

24.20. Mental Health

24.20.1. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

24.20.2. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

24.20.3. If staff have a mental health concern about a child they must report it to the DSL or DDSLs immediately via CPOMS.

24.20.4. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are trained to develop awareness of how these children's experiences, can impact on their mental health, behaviour and education.

24.20.5. All staff should be alert to the links between mental health, school attendance and progress.

24.20.6. Mental health problems which can develop into safeguarding concerns include self-harm, suicidal ideation and risk of suicide.

24.20.7. Referrals for mental health support are made via the DSL and DDSL team.

24.20.8. Indicators of mental health problems can include significant changes in behaviour, difficulty sleeping and physical signs of self-harm.

24.20.9. If a child is in immediate danger of harm then the safeguarding team will contact emergency services.

24.20.10. If staff have a concern that a child's mental health that is also a safeguarding concern, they should swiftly report to the safeguarding team via CPOMS.

24.21. Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

Staff will be alert to the signs of forced marriage including, but not limited to, the following:

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

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Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023 any form of marriage for someone under 18 is illegal, even where violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

24.22. Preventing radicalisation & extremism

For the purpose of this policy, we have used the following definitions:

- **"Radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies
- **"Extremism"** refers to the promotion or advancement of an ideology based on violence, hatred or intolerance[, that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- **"Terrorism"** refers to an action that endangers or causes serious violence to a person or people, property, or electronic system, which is designed to influence the government, intimidate the public, or advance a cause.

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

24.22.1. Training

- The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

24.22.2. Risk indicators of vulnerable students

- Indicators of an identity crisis:
  - Distancing themselves from their cultural/religious heritage
  - Uncomfortable with their place in society
- Indicators of a personal crisis:
  - Family tensions
  - A sense of isolation
  - Low self-esteem
  - Disassociation from existing friendship groups
  - Searching for answers to questions about identity, faith and belonging

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- Indicators of vulnerability through personal circumstances:
  - Migration
  - Local community tensions
  - Events affecting their country or region of origin
  - Alienation from UK values
  - A sense of grievance triggered by personal experience of racism or discrimination
- Indicators of vulnerability through unmet aspirations:
  - Perceptions of injustice
  - Feelings of failure
  - Rejection of civic life
- Indicators of vulnerability through criminality:
  - Experiences of dealing with the police
  - Involvement with criminal groups

24.22.3. Making a judgement

- When making a judgement, staff will ask themselves the following questions:
  - Does the student have access to extremist influences?
  - Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
  - Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?
  - Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
  - Does the student sympathise with or support illegal/illicit groups?
  - Does the student support groups with links to extremist activity?
  - Has the student encountered peer, social, family or faith group rejection?
  - Is there evidence of extremist ideological, political or religious influence on the student?
  - Have international events in areas of conflict and civil unrest had a noticeable impact on the student?
  - Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?
  - Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
  - Does the student vocally support terrorist attacks, either verbally or in their written work?
  - Has the student witnessed or been the victim of racial or religious hate crime?
  - Is there a pattern of regular or extended travel within the UK?
  - Has the student travelled for extended periods of time to international locations?
  - Has the student employed any methods to disguise their identity?
  - Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
  - Does the student display a lack of affinity or understanding for others?
  - Is the student the victim of social isolation?
  - Does the student demonstrate a simplistic or flawed understanding of religion or politics?
  - Is the student a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
  - Does the student have insecure, conflicted or absent family relationships?
  - Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
  - Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?
- Critical indicators include where the student is:
  - in contact with extremist recruiters;
  - articulating support for extremist causes or leaders;

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    - accessing extremist websites;
    - possessing extremist literature;
    - using extremist narratives and a global ideology to explain personal disadvantage;
    - justifying the use of violence to solve societal issues;
    - joining extremist organisations;
    - making significant changes to their appearance and/or behaviour.
- Any member of staff who identifies such concerns, as a result of observed behaviour or reports of conversations, will report these to the DSL.
- The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

24.22.4. Channel programme

- Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a susceptible student is at risk of being involved in terrorist activities. In line with statutory duties, the school will cooperate with the local Channel Prevent panel and all partners of the panel as much as is appropriate and reasonably practical.
- In cases where the school believes a student is potentially at serious risk of being radicalised, the Headteacher or DSL will contact the Channel programme. Such referrals will require the individual's consent.
- The Channel programme ensures that susceptible children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity. The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.
- The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from children's social care, or where the individual is already known to children's social care. The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

24.22.5. Building children's resilience

- The school will:
    - provide a safe environment for debating controversial issues;
    - promote fundamental British values, alongside students' spiritual, moral, social and cultural development;
    - allow students time to explore sensitive and controversial issues;
    - provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing;
    - equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments;
    - teach students about how democracy, government and law making/enforcement occur;
    - teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

24.22.6. Resources

- The school will utilise the following resources:
    - Local safeguarding arrangements
    - Local police (contacted via 101 for non-emergencies)
    - The DfE's dedicated helpline (020 7340 7264)
    - The Channel awareness programme
    - The Educate Against Hate website

24.23. Homelessness

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

24.23.2. Indicators that a family may be at risk of homelessness include the following:

- Household debt;
- Rent arrears;
- Domestic abuse;
- Anti-social behaviour;
- Any mention of a family moving home because "they have to"

24.23.3. Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm;

24.23.4. For 16- and 17-year-olds, homelessness may not be family-based and referrals to children's services will be made as necessary where concerns are raised.

24.23.5. The Local Authority is required to notify the school when a pupil is placed in temporary accommodation, so appropriate support can be provided to the child.

24.24. Students with family members in prison

24.24.1. Students with a family member in prison will be offered pastoral support as necessary.

24.24.2. Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

24.24.3. Staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

24.25. Students required to give evidence in court

24.25.1. Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

24.25.2. Students will also be provided with the booklet 'Going to Court and being a witness' from HM Courts and Tribunals Service where appropriate and allowed the opportunity to discuss questions and concerns.

24.26. Looked After Students

We keep a list of students who are looked after by the local authority. In the light of the research that shows that these students fare less well at schools than their peers and to narrow this gap, we monitor their progress and wellbeing carefully by:

- being involved in and following the guidance set out in the student's personal education plan (PEP)
- arranging for one of our safeguarding team (or for another teacher to whom the child relates well) to take a particular interest in the student's welfare and to talk to them regularly offering in school support such as anger management, assertiveness or social skills training as appropriate
- targeting Student Premium specifically to support children in care
- attending any liaison or review meetings held on their behalf, including speaking for them or acting as their advocate at such meetings should they request it, and keeping in touch with social workers and/or carers
- monitoring their attendance carefully and reporting any unexplained absence to social care and the Educational Welfare service
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- informing their Head of Progress that they are on the looked after register without

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breaching confidentiality so he/she knows to register any concerns speedily to the safeguarding team
- being careful not to accept any under achievement just because the child is 'looked after'
- looking out for difficulties with homework or resources that may be a result of their being in care and giving them help to organise and manage their work and by providing the resources needed
- enlisting the support of and liaising with other agencies as appropriate
- liaison with the student's Virtual Headteacher, who has a responsibility for the educational progress of looked after students and promoting the educational achievement of children in kinship care
- checking that they have access to all elements of school life, including visits and other activities, and by giving these students the opportunities to take part in those self-esteem projects/residentials organised by the school as and when appropriate
- Members of the safeguarding team will have expertise in SEND (not all)
- In addition we also keep a record of those students who are looked after by someone other than a parent, Adopted or on Special Guardianship plans. We offer them a support package (chosen from the above) appropriate to their particular circumstances.

24.27. Private fostering

Where the school becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

24.28. Homestay exchange visits

24.28.1. School-arranged homestays in UK

- Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.
- In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.
- Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host.
- In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

24.28.2. School-arranged homestays abroad

- The school will liaise with partner schools to discuss and agree the arrangements in place for the visit.
- The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.
- The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.
- Students will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

24.28.3. Privately arranged homestays

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

24.29. Young Carers

It is the responsibility of the DSL (or a DDSL) to keep a record of those students who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement. We offer support to these students appropriate to their individual situation. This support would contain elements of the support offered to students looked after by the local authority.

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Caring responsibilities can impact on the attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support.

24.30. Students with SEND

SEND children are more likely to be abused or neglected and for this to go unnoticed. They may be less able to recognise or understand that they are being abused. Communication difficulties may make it harder for them to disclose abuse and/or dependency on their care giver may mean they have no-one to tell. Our SENCos works closely with the safeguarding team to ensure our students have an added layer of protection.

24.30.1. Staff will be aware of the following:

- Certain indicators of abuse such as behaviour, mood and injury may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Students with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

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

24.30.3. When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the school's SENCos/ Assistant Headteacher (Inclusion), as well as the student's family where appropriate, to ensure that the student's needs are effectively met.

24.31. Students with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

24.32. Lesbian, gay, bisexual, transgender, queer & others (LGBTQ+)

24.32.1. As a school, we believe that respect for ourselves and others is a fundamental right and responsibility of/for all. It is the duty of all staff to ensure that every member of the school community feels valued, irrespective of their sexual/gender orientation, race or religion.

24.32.2. The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

24.32.3. When families/carers are making decisions about support for gender questioning children, they should be encouraged to seek professional help and advice.

24.32.4. When supporting a gender questioning child, school staff should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any professional advice that is available and how to address wider vulnerabilities such as the risk of bullying.

24.32.5. Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to

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reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

24.32.6. Where a pupil is gender questioning the school will actively involve parents/carers, unless doing so would constitute a greater risk to the child than not involving them. The assessment as to risk resides with the DSL.

24.32.7. Staff should not initiate any action regarding approaching a child about gender transitioning. However, where a child or their parent has raised a request relating to social transition staff should pass the request to the DSL who will liaise with the family to ensure the child feels supported, understood and safe in the school and wider community.

24.32.8. The school will maintain open dialogues with families and also support those children who wish to detransition.

24.32.9. In order to safeguard pupils, staff should be aware of the needs and vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, school or college friends/staff may be unaware of their biological sex).

24.32.10. Furze Platt does not tolerate bullying or discrimination. Staff should report any incidents of bullying or discrimination via CPOMS.

24.32.11. Staff should not adopt any changes relating to social transitioning unless a decision has been made by the DSL and the child's parent have been involved. This would include factors like changing a child's preferred name or pronoun.

24.32.12. If a pupil who is questioning their gender doesn't want to use the toilet, changing rooms and showers designated for their biological sex, there are separate single use facilities available to ensure the comfort, privacy and dignity of all pupils in maintained. KSCIE 2026 outlines schools must not allow children into toilets, changing rooms or showers, designated for the opposite biological sex.

24.32.13. Schools can separate children according to their biological sex when playing competitive sports. Some sports may need to be played in single-sex groups from a certain age, to ensure children's safety. The school delivers the same sporting curriculum to both biological sexes.

24.32.14. Should a child make a request regarding how they participate in sports, the DSL will consider the request in light of guidance on 'considering requests for support with social transition'.

24.33. Other vulnerable students

Members of the safeguarding team are often aware of students who are vulnerable for other reasons. It is their responsibility to ensure that these students receive support either from a teacher in school to whom the student relates or from an external agency. The student's Head of Progress will be informed of the situation. This situation might be a temporary one or may be on-going. This also includes any vulnerable students who may be 18 and over in our Sixth form. Parents/carers are informed of the situation wherever appropriate.

24.34. Sexual Images (sexting)

It is illegal for sexual or indecent (nude or semi-nude) images or videos of a child under 18 to be taken and or distributed

- Person/student under 18 creates a sexual image of themselves and shares it with another person under 18
- Person/student under 18 shares an image of another under 18 with another person under 18 or an adult
- Person/student under 18 is in possession of sexual imagery created by another person under 18

All incidents of sexual images should be reported to a member of the safeguarding team. The image/s and the device they are stored within should be confiscated, examples would be:

- naked student

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- topless girl
- image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. 'The primary concern at all times should be the welfare and protection of the young people involved.'

- Refer to the DSL/DDSL
- DSL/DDSL/HoP meets with the student involved
- Do not view the image unless it is unavoidable
- Discuss with parents, unless there is an issue where that's not possible
- If there is a concern that the student is at risk of harm, we will contact social care and/or the police
- External agencies such as Internet Watch Foundation may be contacted for support in removing harmful online images.

We will always refer to the police or social care if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g., SEN]
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

The school will do everything in its power to reduce the impact of abuse as far as is possible during the time that the child is in our care. The action points for this will vary from child to child depending on the type of abuse, their age, circumstances and personal development.

25. Restrictive interventions, including reasonable force

25.1 'Restrictive interventions' are a range of ways that staff might restrain or restrict a pupil.

25.2 'Reasonable force' describes the amount of force that those staff members can (in certain circumstances) use on a pupil.

25.3 Seclusion is a non-disciplinary intervention involving keeping a pupil confined to a place away from others, and preventing them from leaving either by physical obstruction, blocking, or making them believe they will be punished if they try to leave.

25.4 Under DfE's guidance 'Restrictive interventions, including use of reasonable force, in schools', all members of school staff can use a restrictive intervention – including reasonable force – to prevent or stop a pupil from:

- Causing injury to themselves or others
- Committing a criminal offence
- Damaging property

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- Causing disorder among pupils at the school, whether during a teaching session or otherwise

25.5 Staff should only put a pupil in seclusion to protect others from harm, when a pupil is experiencing high levels of emotional or behavioural dysregulation. The pupil should be supervised during the whole period of seclusion. When the immediate risk of harm is reduced, the pupil should be allowed to leave. Staff should be aware that restraint carries a risk of physical and psychological harm and should be avoided where possible. Before staff use any restrictive intervention, they should assess whether it's necessary and proportionate and consider the pupil's welfare.

25.6 It is illegal to use force on a pupil for the purpose of punishment. Pupils should not be restrained in a way that affects their airway, breathing or circulation. If a pupil is unintentionally held on the ground, staff should release them, or re-position into a safer alternative or standing position as quickly as possible.

25.7 Headteachers and other members of staff authorised by the headteacher have the statutory power to search pupils and/or their possessions if they have reasonable grounds to suspect that the pupil has a prohibited item. Guidelines permit the use force to search a pupil for a prohibited item, but not to search for an item banned only under the school rules.

25.8 Before using a restrictive intervention (see 'Definitions' section, above) with a pupil, staff should consider:

- If it's necessary: there might be alternative ways to manage the situation and achieve the desired outcome, and staff should consider whether the intervention is likely to reduce risks or might escalate the situation further
- If it's proportionate: staff should use the least restrictive intervention for the least amount of time, and consider the individual circumstances of the pupil such as their age, size and any medical conditions
- The pupil's welfare: staff should consider the impact that the use of force or restrictive interventions can have on a pupil, for example for pupils who have experienced adverse life events. They should also seek to maintain respect for their dignity

25.9 The school will train staff in prevention and de-escalation strategies and outlines its behaviour support mechanisms within the Behaviour for Learning Policy.

25.10 Where there is a known risk of restrictive interventions being required for a pupil, risk assessments will be carried out.

25.11 Following any incident of restrictive intervention or reasonable force, staff must report the incident immediately to the school's Designated Safeguarding Lead.

25.12 The school has a legal duty to record and report all significant incidents in which a member of staff uses force on a pupil or incidents where a member of staff uses seclusion or restraint on a pupil in line with the requirements of the DfE's guidance '<u>Restrictive interventions, including use of reasonable force, in schools</u>'

25.13 The school will inform parents/carers of any reported incidents of restrictive intervention or reasonable force. However, if informing parents would likely cause significant harm to the pupil then the Local authority will be informed instead.

26. Communication & Confidentiality

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

26.2. All safeguarding staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

26.3. The Data Protection Act 2018 and GDPR do not prevent the sharing, holding or use of information for the purposes of keeping children safe. The school will share and/or use all relevant information with our safeguarding partners that is required in order to safeguard and promote the welfare, including their educational outcomes, and protect the safety of our students. This includes sharing information without consent where there is good reason to do so.

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26.4. Where the ‘serious harm test’ fits, the school will withhold providing the data in compliance with our obligations under the Data Protection Act 2018 and the GDPR, seeking independent legal advice where necessary.

26.5. Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator(s) and their parents.

26.6. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the students involved in the case.

26.7. Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

26.8. During disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

26.9. Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim’s consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.

- Before doing so, the DSL will weigh the victim’s wishes against their duty to protect the victim and others.
- Where a referral is made against the victim’s wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

26.9.1. Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved.

26.9.2. Discussions with parents will not take place where they could potentially put a student at risk of harm.

26.9.3. Discussion with the victim’s parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.

26.9.4. Discussion with the alleged perpetrator’s parents will have regards to the arrangements that will impact their child, such as moving classes etc., with the reasons behind decisions being explained and the available support discussed.

26.9.5. External agencies will be invited to these discussions where necessary.

26.9.6. Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

26.9.7. Where a student is leaving the school, the DSL will consider whether it is appropriate to share any information with the student’s new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

27. Evaluation Of Safeguarding Procedures

In order to evaluate our safeguarding procedures we will ensure that:

- The DSL and Governor responsible for safeguarding meet at least once a (long) term to review any safeguarding/child protection issues
- The DSL and Safeguarding Governor will complete an annual safeguarding audit
- This policy will be reviewed at least annually by the Governing Body (and more frequently if necessary)

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APPENDIX 1: Taking action – what should staff do

All staff should read <u>'What to do if you're worried a child is being abused'</u>

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APPENDIX 2: Taking action – How should children report a concern

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APPENDIX 3: Managing allegations against staff, supply teachers, trainee teachers, contractors and volunteers in school

Initial Action

- The person who has received an allegation or witnessed an event will immediately inform the Headteacher and make a record
- In the event that an allegation is made against the Headteacher the matter will be reported to the Chair of Governors who will proceed as the 'Headteacher'
- The Headteacher will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs
- The member of staff will not be approached at this stage unless it is necessary to address the **immediate** safety of children
- The Headteacher may need to clarify any information regarding the allegation, however, no person will be formally interviewed or asked to give a formal statement at this stage
- The Headteacher will consult with the Local Authority Designated Officer (LADO) (see below) in order to determine if it is appropriate for the allegation to be dealt with by the school or if there needs to be a meeting with social care and/or the police to consider if they should undertake an investigation
- Consideration will be given throughout to the support and information needs of students, parents and staff
- The Headteacher will inform the Chair of Governors of any allegation
- The Headteacher/Chair of Governors must report all allegations against staff and volunteers to the LADO (Local Authority Designated Officer)
- In some circumstances the school will have to consider an allegation against an individual not directly employed by them; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business. Where this applies, schools and colleges share safeguarding responsibilities with the employment agency or business. Schools and colleges remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action. LADO referrals may still be made by the school in these circumstances.

  RBWM LADO: 020 8891 7370 / 07774 332675 / lado@achievingforchildren.org.uk

Allegations against staff and volunteers in school

What is an allegation against a member of staff or volunteer?
An allegation is defined as where:
it is alleged that a person working with children or young people (including a volunteer) has:

- behaved in a way that has harmed a child, or may have harmed a child;
- 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 if they work regularly or closely with children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

What procedures are followed when an allegation is made?
All allegations should be reported to the Headteacher (or Chair of Governors when the allegation is against the Headteacher) who should discuss this with the Local Authority Designated Officer (LADO) for allegations against staff/persons working with children. The LADO will consider whether a meeting should be held with Children's Social Care and the police to discuss if/how the allegation will be investigated. Local Safeguarding Children Board procedures will be followed.

What should I do if I am concerned about the behaviour of a colleague?
Staff and volunteers must bring concerns to the attention of their managers (in accordance with

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Whistleblowing policy.)

What if a staff member feels unable to raise an issue with the Headteacher or feels that their concerns are not being addressed?
The NSPCC's 'What you can do to report abuse' dedicated helpline is available as an alternative. Staff can call 0800 028 0286 between 8:00am and 8:00pm Monday to Friday or email help@nspcc.org.uk

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In an allegation is made against me will I be immediately suspended and prevented from having contact with colleagues?
DfE Guidance *Dealing with allegations of abuse against teachers and other staff, October 2012* states that:
Suspension should only be considered in all cases where:

- there is cause to suspect a child or other children and school are at risk of significant harm, or
- it is so serious that it might be grounds for dismissal.

The school will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements. The power to suspend is vested in the Headteacher of the school. The Governing Body retain the power to suspend the Headteacher.

As employers, we have a duty of care to employees. We should act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by Children's Social Care or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling.

The person who is the subject of the allegation should be kept informed of the progress of the case, and where appropriate, offered support. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Actions on conclusion of the case
Allegations are categorised as:

a) **Substantiated**: there is sufficient identifiable evidence to prove the allegation:
b) **False**: there is sufficient evidence to disprove the allegation;
c) **Malicious**: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false:
d) **Unfounded**: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances;
e) **Unsubstantiated**: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

If the allegation is substantiated and the person is dismissed or the school ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO will discuss with the school and its personnel adviser whether a referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists or to the Teaching Regulation Agency (TRA)is required. There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child. Professional misconduct cases should be referred to the relevant regulatory body. The DBS will consider whether to bar the person from working in regulated activity, which will include work in schools and other educational establishments.

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, the school will consider how best to facilitate that.

APPENDIX 4: Contacts & Advice

Expert organisations

- Child Exploitation and Online Protection command: CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors.
- The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk . The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies) (When to call the police)
- Support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust
- The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying.
- Barnardo's
- Lucy Faithfull Foundation 'Shore Space' confidential chat service for young people concerned about their own or others sexual thoughts and behaviours.
- University of Bedfordshire: Contextual Safeguarding
- UK Safer Internet Centre
- SENDIASS
- NSPCC advise on stages of typical sexual development and behaviour https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour/understanding#skip-to-content

Support for victims

- Anti-Bullying Alliance
- MoJ Victim Support
- Rape Crisis
- The Survivor's Trust
- Victim Support
- Lucy Faithfull Foundation's 'Shore Space'

Toolkits

- Brook
- NSPCC
- Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire
- The Centre of Expertise on Child Sexual Abuse's new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours
- The Children's Society and Home Office's guide to preventing child sexual exploitation

Further information on confidentiality and information sharing

- Gillick Competency Fraser Guidelines
- Government Information Sharing Advice
- Information Commissioner's Office: Education
- NSPCC: Things to Know and Consider

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Further information on sexting

- UK Council for Child Internet Safety: Sexting Advice
- London Grid for Learning – Collection of Advice

Support for parents

- Parentzone
- Parentsafe – London Grid for Learning
- CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
- CEOP Thinkuknow – Supporting Positive Sexual Behaviour

Online Support

The school recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:

The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues.

Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)

Childline/IWF *Report Remove* is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online.

UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).

LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

National Crime Agency – Cyber Choices

Operation Encompass

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