The Olympus Academy Trust
Safeguarding and Child Protection Policy

Document Summary

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On Trust website?	Yes
On School Websites?	Yes

*This policy has initially been created by the document owner and approved as a model by the Board of Trustees. Schools have then adapted relevant sections to reflect their own individual settings and final approval for this has been provided by the School Improvement Committee as the table above.

Amendment History

Version	Amendment Date	Author	Amendment Summary
v1.1	28th April 2021	Trust SEND, Inclusion and Safeguarding Lead	• Policy Review • New Trust document version system implemented • New Sections 21, 22, 23 and 24 added in response to the Ofsted Review of Sexual Violence and Sexual Harassment in Schools.
v1.1	6th May 2021		• Approved by the ARC.
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v2.1	1st September 2021	Trust SEND, Inclusion and Safeguarding Lead	• Annual Policy Review
v2.1	8th September 2021		• Approved by the Board of Trustees
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v4.0	August 2022	Trust SEND, Inclusion and Safeguarding Lead	• Annual Policy Review – awaiting approval
v4.0	October 2022		• Policy approved by Board of Trustees
v4.0	October 2022	Policy Coordinator	• Policy issued to schools to update with their relevant details and add to their websites.
v5.0	July 2023	Trust SEND, Inclusion and Safeguarding Lead	• Policy updated to reflect changes to legislation
6.0	July 24	Trust SEND, Inclusion and Safeguarding Lead	• Policy updated to reflect changes to legislation (see tracked changes)
6.1	August 24	Policy coordinator	• Policy approved by Board of Trustees and sent to schools
7.0	August 25	Trust Director for SEND, Inclusion and Safeguarding	• Policy updated to reflect changes in legislation (see tracked changes in version 7.0)
8.0	July 2026	Trust Director for SEND, Inclusion and Safeguarding	• Updated to ensure compliance with KCSIE 2026
9.0	2nd September 2026	Director of Governance	• Approved by Board of Trustees

Contents

Important contacts	3
1. Aims	4
2. Legislation and statutory guidance	4
3. Definitions	5
4. Equality statement	6
5. Roles and responsibilities	7
6. Confidentiality	14
7. Recognising abuse and taking action	15
8. Online safety and the use of mobile technology	29
9. Notifying parents or carers	32
10. Learners with special educational needs, disabilities or health issues	32
11. Learners with medical conditions	33
12. Young Carers	33
13. Learners with a social worker	33
14. Looked-after and previously looked-after children	33
15. Learners who are lesbian, gay or bisexual	34
16. Learners who are questioning their gender	34
17. Complaints and concerns about school safeguarding policies	35
18. Record-keeping	36
19. Training	37
20 Checking the identity and suitability of visitors	38
21. Monitoring arrangements	39
22. Links with other policies	39

Important contacts

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Channel helpline		020 7340 7264
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Trust Director for Safeguarding, SEND and Inclusion	Susie Beresford-Wylie	Susie.beresfordwylie@olympustrust.co.uk

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Charborough Road Primary School is committed to creating and embedding a culture of vigilance which:

- ensures we maintain an attitude of "It could happen here";
- ensures that our learners are safe and protected and their welfare is promoted;
- ensures that our learners know who to talk to if they have concerns;
- ensures that our learners are supported, protected and informed;
- ensures that our learners are safe from discrimination, and bullying and other forms of child on child abuse;
- ensures that our learners recognise when they are at risk and know how to get help when they need it;
- ensures that our learners understand about how to keep themselves safe both online and offline as part of a broad and balanced PSHE and online safety curriculum;
- focuses on preventative work in relation to adverse childhood experiences (ACEs) and takes an ACE- aware approach.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023) , and the Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy aligns with the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of learners at the school
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of learners at the school
    - The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
    - Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
    - Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
    - The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
    - Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
    - Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
    - The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
    - The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Headteacher and Trustees/governors should carefully consider how they are supporting their learners with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting learners (where we can show it is proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment.
    - The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
    - Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse. At the time of writing this policy, Avon and Somerset Police remain unable to comply with this.

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy also complies with our funding agreement and articles of association.

This policy also complies with multi-agency procedures put in place by our three safeguarding partners.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix A explains the different types of abuse.

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

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

Children includes everyone under the age of 18.

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

- The local authority (LA)
- integrated care boards
- The chief officer of police for a police area in the LA

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

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

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

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

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

- Our Behaviour policy
- Our pastoral support system
- A planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based

violence such as forced marriage and female genital mutilation (FGM) and how to access support

- What constitutes sexual harassment and sexual violence and why they are always unacceptable

In addition, as part of the ethos of the school, the staff and those responsible for governance are committed to:

- ensuring the school practises safer recruitment in checking the suitability of staff and volunteers to work with learners;
- ensuring that all staff and volunteers understand, and adhere to, the school's code of conduct;
- learner health and safety;
- providing first aid as and when required;
- having clear processes regarding intimate care;
- meeting the needs of our learners with medical conditions;
- having pastoral systems which support early identification and early help through the early help assessment process;
- developing inclusive practice which promotes the voice of the child and seeks to reduce the barriers that learners from vulnerable backgrounds may have and which may in turn affect their mental health and well-being, as well as their ability to share information about maltreatment and abuse;
- establishing and maintaining a safe school environment, where all learners feel secure, can learn and develop, are encouraged to talk and are listened to;
- including opportunities in the strands of the PSHEE, ICT curriculum and whole school approach to care, guidance and support, for learners to develop the skills they need to recognise, and stay safe from abuse;
- using the updated guidance on Education in a Connected World to review the learning opportunities for learners in school
- ensuring all teaching and support staff are aware of signs and symptoms of abuse, know the correct procedure for referring concerns or allegations against staff and receive appropriate training to enable them to carry out these requirements;
- ensuring all volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection;
- exercising their duty to work in partnership with other agencies and to share information with them, including attendance at child protection conferences; core groups and preparation of reports for conferences;
- encouraging and supporting parents/carers, working in partnership with them;
- supporting learners in accordance with their agreed child protection plan;
- a child-centred approach, making it clear what our staff should do to keep children safe. In doing so, seeking to emphasise that effective safeguarding systems are those where:
- the child's needs are paramount, and the needs and wishes of each child should be put first, so that every child receives the support they need before a problem escalates;
- all staff who come into contact with children and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children;
- ensuring learners know they can talk to staff confidentially by reminding them in assemblies, updating the learner safeguarding notice board and signposting them as required;

- ensuring that we focus on the importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare and assess the risks and issues in the wider community when considering the well-being and safety of our learners.

5.1 All staff

- Read and understand part 1 and annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (2026) , . Every staff member will be required to complete an online test on the National College platform to ensure they fully understand this information. The Trust retains records of completion
- Complete the annual *Prevent* module on the National College platform
- Complete annual medical needs training on the National College platform
- Reinforce the importance of online safety when communicating with parents/carers. This includes making parents/carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Provide a safe space for learners who are LGBT to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and their deputy/deputies, the behaviour policy, the Trust Online Safety and Acceptable Use Policy, online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education or are absent from Education
- Be aware of the school's unauthorised absence procedures and children missing from education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

The safeguarding issues that often overlap and can put children at risk of harm, including:

- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or trans (LGBT) can be targeted by other children and vulnerable to discriminatory bullying.
- The potential vulnerabilities of children who are questioning their gender

The school also has a duty to ensure that professional behaviour applies to relationships between staff and young people and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. Information on Safer Working practice (April 2022) is included in the Trust Staff Safeguarding Handbook and forms part of all staff induction safeguarding and child protection training.

Staff should be explicitly aware of the dangers inherent in:

- working alone with a young person;
- physical interventions;
- cultural and gender stereotyping;
- dealing with sensitive information;
- giving to and receiving gifts from learners and parents/carers;
- contacting young people through private telephones (including text), email, MSN or social networking sites;
- disclosing personal details inappropriately;
- meeting learners / young people outside school hours or school duties;
- using their personal phones to take pictures of learners which is not permitted under any circumstance.

Physical Contact, restraint and the use of reasonable force

Members of staff may have to make physical interventions with learners; this should only be done where:

- it is necessary to protect the learner, or another person, from immediate danger
- the member of staff has received suitable training such as positive handling training

All schools will draw up individual plans for vulnerable learners to reduce risk, such as those with SEN and disabilities and be aware that:

- Use of reasonable force applies to learners with or without SEN
- Staff will follow the Trust Physical Intervention Policy.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is the Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep learners safe online. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can be contacted out of hours on matt.lankester@olympustrust.co.uk.

When the DSL is absent, the Deputy Safeguarding Leads – will act as cover.

If the DSL and Deputy Safeguarding Leads are not available or absent, we have cover arrangements in place. This includes:

- a shared Trust mailbox so other members of staff can act on safeguarding concerns/DSL/DDSL cover for the role for periods of illness

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

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

The DSL will also:

- Keep the Headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns, as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Where children leave the school, ensure their child protection file is transferred to the new school
- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Ensure each member of staff has access to, and understands, the school's safeguarding and child protection policy and reporting procedures, especially new and part-time staff;
- Ensure all new staff attend safeguarding induction training and have a copy of the Trust's safeguarding handbook;
- Ensure that relevant staff have read and understand Annex A and Part 1 KCSIE 2026;
- Ensure that all staff complete their annual KCSIE online training module and Prevent training and provide a yearly update training session during INSET to all staff as well as ongoing CPD and e-bulletins during the year for staff to support the culture of safeguarding;
- Are alert to the specific needs of children in need, those with special educational needs, health needs and young carers;

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- Understand the importance of information sharing, within the school, and with the three safeguarding partners, other agencies, organisations and practitioners;
- Keep detailed, accurate, secure written records of concerns and referrals using CPOMS;
- Understand and support the school with regards to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation;
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school (or college);
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.
- In addition to their formal training, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads at the termly Trust Forum and participating in training and Trust reviews, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role;
- Keep a training plan for the school which shows all training throughout the year, which includes safer recruitment trained staff members;
- Be vigilant with regard to any learners who attend off-site alternative provision and the additional risk of harm associated with AP (alternative provision) sites.

5.3 The Trust Board and School Improvement Committee

The Board of Trustees will:

- Appoint a Trustee for Safeguarding to monitor the effectiveness of this policy in conjunction with the School Improvement Committees. (SICs)

The SICs will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full School Improvement Committee. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect learners
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix D of this policy covers this procedure.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the learners who attend these services/activities are learners on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Ensure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Ensure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All School Improvement Committee members will read *Keeping Children Safe in Education 2026* in its entirety.

5.4The Headteacher

The Headteacher is responsible for the implementation of this policy, including ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety filtering and monitoring and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

Early Years Foundation Stage (EYFS)

The Headteacher/DSL is responsible for ensuring the following:

- That relevant staffing ratios are met, where applicable for Early Years . Suitable learners on long term placements and volunteers (aged 17 or over) and staff working as apprentices in early education (aged 16 or over) may be included in the ratios at the level below their level of study, if the provider is satisfied that they are competent and responsible and if they hold a valid and current PFA qualification.
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting
- That staff have completed the paediatric first aid training and this is included in the school training plan
- Whilst learners are eating there should always be a member of staff in the room with a valid paediatric first aid certificate.
- Before a child is admitted to the school, information about any special dietary requirements, preferences, food allergies and intolerances that the child has, and any special health requirements must be obtained. This information must be shared by the DSL/headteacher with all staff involved in the preparing and handling of food. At each mealtime and snack time leaders must be clear about who is responsible for checking that the food being provided meets all the requirements for each child.
- That there are ongoing discussions with parents and/or carers and, where appropriate, health professionals to develop allergy action plans for managing any known allergies and intolerances. This information must be kept up to date and shared with all staff. Ensuring that all staff are aware of the symptoms and treatments for allergies and anaphylaxis, the differences between allergies and intolerances and that children can develop allergies at any time, especially during the introduction of solid foods which is sometimes called complementary feeding or weaning. Assumptions must not be made based on age. Food must be prepared in a suitable way for each child's individual developmental needs, working with parents and/or carers to help children move on to the next stage at a pace right for the child. Food must be prepared in a way to prevent choking.
- Children must always be within sight and hearing of a member of staff whilst eating. Choking can be completely silent therefore it is important for staff to be alert to when a child may be starting to choke. Where possible, staff should sit facing children whilst they eat so they can make sure children are eating in a way to prevent choking and so they can prevent food sharing and be aware of any unexpected allergic reactions. When a child experiences a choking incident that requires intervention, the school should record details of where and how the child choked and parents and/or carers made aware. The records should be reviewed periodically to identify if there are trends or common features of incidents that could be addressed to reduce the risk of choking. Appropriate action should be taken to address any identified concerns.

- A learner's privacy is considered and balanced with safeguarding and support needs when changing nappies and toileting

5.5 Virtual school Heads

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

VSHs also have a non-statutory responsibility to promote the educational achievement of learners in kinship care (those who live with a relative or close family friend).

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

6. Confidentiality

The Trust has a Data Protection policy.

In relation to sharing safeguarding and child protection information the following applies:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The Government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.

7. Recognising abuse and taking action

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

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is pregnant and/or is a parent themselves
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit

Staff, volunteers and governors must follow the procedures set out in Appendix D (flowchart) in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Referrals for safeguarding and child protection should be made to the Access and Response Team (ART) - Access and Response Team (ART) | South Gloucestershire (southglos.gov.uk)

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

7.3 If you discover that FGM has taken place or a learner is at risk of FGM

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

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

Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk.

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out or discovers that a learner **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

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

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

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

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

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

Early help assessment

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

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

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

We will work with our partners in Compass where necessary.

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

South Glos. Access and Response

Telephone number 01454 866000

Bristol Children's Services (Student's home postcodes: BS7-10)

Telephone number 0117 9038700

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

The Local authority escalation procedures can be found here: Resolution-of-Profesisonal-Differences-Policy-Oct-2020-FINAL.pdf (southglos.gov.uk)

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

7.6 Mental health concerns

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

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

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

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

Any member of staff who is concerned about the mental health or wellbeing of a learner should ensure that this information is shared with the DSL. The DSL and safeguarding team will then triage and refer it on to the key Mental Health First Aiders/DMHL in the school for investigation

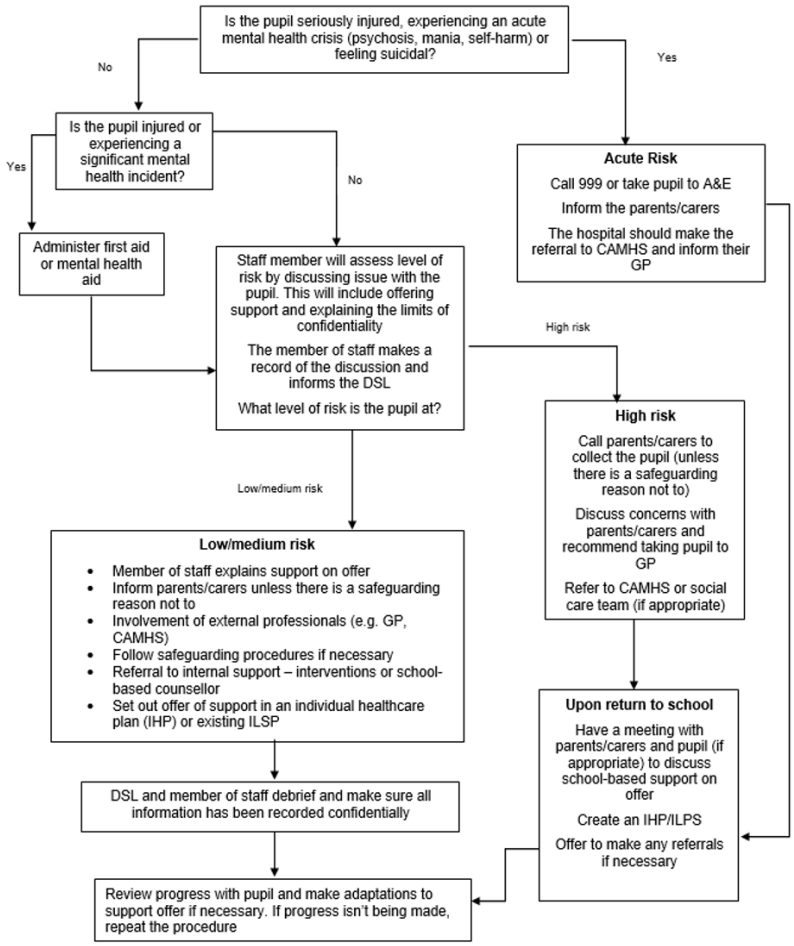
and support. Decisions about appropriate support will be made on a case-by-case basis by the DSL, DMHL and MHFA.

If there is a fear that the learner is in danger of immediate harm, then the normal **child protection procedures should be followed with an immediate referral to the DSL as detailed in the school child protection and safeguarding policy.**

If the learner presents a medical emergency then the normal procedures for medical emergencies should be followed, including alerting the **first aid staff** and contacting the emergency services if necessary.

Any first aid treatment should also be recorded in Arbor by the staff administering treatment. This should be done within 24 hours.

Procedure to follow in a mental health emergency



Tracking learners with Mental Health concerns

The **Mental Health First Aiders (MHFA) and DMHL** will use CPOMS to record

- Details of concerns
- The Interventions and support given in the school (detailed SEMH interventions within EDUKEY)
- The role the school can play
- Outcomes being sought through intervention
- Referrals to outside agencies
- Liaison with GP or other external organisations

A termly review with the DSL should take place to formally case discuss each learner logged with a mental health concern.

Signposting

We will ensure that staff, learners and parents are aware of sources of support within school and in the local community, including access to our parent helpline, delivered through Wisdom and Post 16 helpline. For learners we will raise awareness through:

- posters in classrooms, toilets and corridors
- presentations in assemblies
- discussions with tutors/class teachers
- PSHE

Crisis support lines will be visible and referred to, such as Anna Freud's crisis line.

Individual healthcare plans (IHPs), EHAP and Integrated Learner Support Plans (ILSP)
Where mental health issues are on-going and are affecting attendance at school, lesson attendance and ability to manage the environment , we will coordinate support through either an IHP, an EHAP (if other agencies are working with the child and family) or through an ILSP

Plans are written in collaboration with the learner (if appropriate), their parent/carer, and any other relevant professionals.

The plan is likely to contain some of the following details:

- The mental health issue (and its triggers, signs, symptoms and treatments)
- The learner's needs resulting from the condition
- Specific support for the learner's educational, social and emotional needs
- The level of support needed
- Who will provide the support
- Who in our school needs to be aware of the child's condition
- What to do in an emergency

Making external referrals

If a learner's needs cannot be met by the internal offer our school provides, our school will make, or encourage parents/carers to make, a referral for external support.

A learner could be referred to:

- Their GP or a paediatrician
- CAMHS
- Mental health charities (e.g. Samaritans, Mind, Young Minds, Kooth)
- Local counselling services

Where the DSL/DMHL feel it is necessary, they will assess risk regarding being able to manage the learner on site if the mental issues are acute. The DSL/DMH may ask for a consultation with the Primary Mental Health school link, or the GP, following consent from the parent or carer.

There will be a written risk assessment when required, which the parent and learner (where appropriate) will contribute to (Appendix D)

Section 19 of the Education Act 1996 states that each local authority must make arrangements for

- the provision of suitable education at school

- for those children of compulsory school age who by reason of illness, exclusion from school or otherwise may not for any period receive suitable education unless arrangements are made for them.

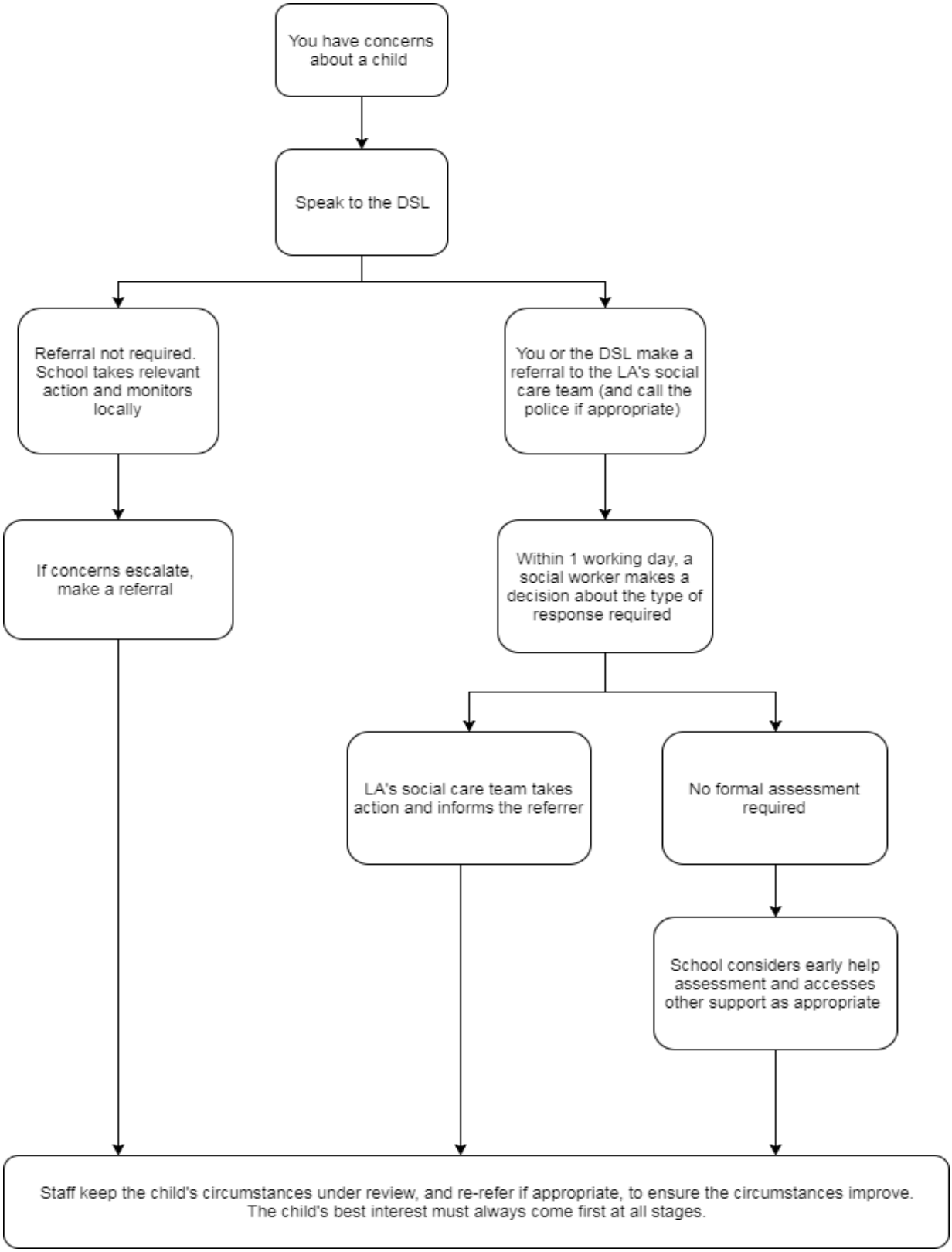
This includes where a learner will be absent from school for over 15 days due to their mental health.

The DSL/DMHL will notify the LA named officer where is believes that, despite adjustments in provision, they are not able to manage the learner's health needs in school at that time.

The Trust *Supporting Learners with Health Needs Who Cannot Attend School* Policy should be read for full details.

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply

teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to a member of the Trust's Executive Leadership Team.

The allegation will be dealt with in accordance with national guidance and agreements, as implemented locally by the South Gloucestershire Children's Partnership.

Part 4 of KCSIE 2026 sets out the responsibility of schools in relation to managing allegations against staff and these are set out fully in the Trust's *Managing Allegations against Staff* policy. This guidance will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers and volunteers 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;
- behaved towards a child or children in a way that indicates that he or she would pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations against a member of staff should be brought to the attention of the Headteacher and/or DSL in the first instance, unless the Headteacher is the subject of the allegation; in this situation the allegation should be referred to the Trust's Executive Leadership Team. If contacted with regard to an allegation against the Headteacher or a member of the Trust's Executive Leadership Team, the Chair of Trustees will need to be informed and will follow the LA *'Guidance for Chairs of Governors Dealing with Child Protection Allegations Against the Headteacher'* and will contact the Local Authority Designated Officer (LADO) without delay.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO). Information about contacting the LADO is on page 3 and within the staff safeguarding handbook

An allegation must not be discussed with the alleged perpetrators or other members of staff / governors, unless advised to do so by a LADO. All concerns against a member of staff must be reported without delay.

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

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

These procedures are also included in staff training.

Low Level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the Olympus Staff Code of Conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over-friendly with children;
- having favourite learners;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate humiliating, intimidating or offensive language.

If the concern has been raised via a third party, the Headteacher/DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns will be recorded in writing, including:

- name* of individual sharing their concerns;
- details of the concern;
- context in which the concern arose;
- action taken.

Staff are able to share low-level concerns confidentially.

Records will be kept confidential, held securely and comply with the Data Protection Act 2018. Information on an individual will be kept at least until the individual leaves our employment.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Reviews will take place as part of the Leadership Meeting agendas throughout the year which have low-level concerns and emotional health and wellbeing of staff as an agenda item.

If a concerning pattern of behaviour is identified and has then met the criteria for an allegation, then the matter will be referred to the LADO.

Further information about low level concerns is contained within the Trust *Managing Allegations* Policy and within the Trust *Staff Code of Conduct*.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

7.8 Allegations of abuse made against other learners

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

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put learners in the school at risk
- Is violent
- Involves learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes) and including where generated by AI, which may include or be driven by misogyny/misandry

See Appendix B for more information about child-on-child abuse.

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

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

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

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

We will support all children – victims, alleged perpetrators and children involved as part of a friendship or wider group.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate learners about appropriate behaviour and consent
- Ensure learners are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

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

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

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

7.9 Making or sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the learner to delete it
- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any learners involved

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

Initial review meeting

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

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any learner in the images or videos is under 13
- The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, including where generated by AI and the decisions made in responding to them, will be recorded.

Curriculum coverage

Learners are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Learners also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with learners so they are aware of the processes the school will follow in the event of an incident.

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our learners

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

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

To achieve this, we will:

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

Children are informed how to report concerns through assemblies, PSHE and ad hoc discussions in class. They are told that they are welcome to speak to any adult they feel able to in school. They are reminded that all conversations cannot be kept secret and that they will always be taken seriously, being reassured that our highest priority is to ensure their safety. How learners will feel safe in submitting any concerns, e.g. reassurances provided following disclosures]

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

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

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and

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

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

Educate learners about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring learners are encouraged to do so, including where they are a witness rather than a victim
- We train our staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when learners are not present
    - Staff will not take pictures or recordings of learners on their personal phones or cameras

- Make all learners, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit learner's exposure to the 4 key categories of risks from the school's IT systems. Filtering and monitoring also applies to the use of generative AI and this is included within the online safety policy
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by the Trust Director for IT and a report will be shared with the Executive Team, Headteachers and DSLs
- Provide regular safeguarding and child protection training updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones and devices, please refer to our Trust Online Safey and Acceptable Use Policy and Mobile Phone policy which includes social media use.

Charborough Road Nursery has a no use of mobile phones policy whilst caring for children. It is our intention to provide an environment in which children, parents and staff are safe from images being recorded and inappropriately used in turn eliminating the concern of staff being distracted from their work with children and the inappropriate use of mobile phone cameras around children.

8.1 Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person
- The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
- Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:
- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

8.2 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini

Charborough Road Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose learners to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Charborough Road Primary School will treat any use of AI to access harmful content or bully learners in line with this policy, our Anti-Bullying and Behaviour Policy and Artificial Intelligence Policy

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

9. Notifying parents or carers

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

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

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

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

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

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

10. Learners with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:'

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners
- The potential for learners with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

Any abuse involving learners with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school will consider extra pastoral support and attention for these children and ensure any appropriate support for communication is in place.

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11. Learners with medical conditions

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

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

12. Young Carers

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

13. Learners with a social worker

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

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

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

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

14. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, the Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

15. Learners who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, learners who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL. The school has a number of experienced staff who are able to support LGB+ learners.

16. Learners who are questioning their gender

16.1 Supporting learners who are questioning their gender

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

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of learners and staff in relation to their religion or belief.

When supporting a learner questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of learners questioning their gender

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

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

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

16.3 Considering requests for support with social transition

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

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

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

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

- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition
- The school will ensure that the decision-making process is documented and records are kept.
- The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Learners are not allowed into toilets, changing rooms, showers for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and learners must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our Allegations of Abuse Against Staff Policy.

17.2 Other complaints

For all other complaints about safeguarding, which relate to learners and premises, these will be handled through the Trust *Complaints Policy*

Our *Early Years* Policy can be found here.

17.3 Whistleblowing

We have a separate Whistleblowing Policy. This policy applies to all employees, Trustees of the Trust and other workers who may be involved in the running of the Trust at any time. Other individuals performing functions in relation to the Trust, such as agency workers consultants and contractors, are encouraged to use it.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a legal obligation has been breached;
- there has been a miscarriage of justice;
- the health or safety of an individual has been endangered;
- the environment has been damaged;
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0800 028 0285 or you can contact them by emailing them directly using help@nspcc.org.uk

18. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be stored securely on the CPOMS system.

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

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

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

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

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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

We will share information with other agencies when this is appropriate, in line with our local safeguarding procedures. Information Sharing | Safeguarding South Gloucestershire (southglos.gov.uk)

19. Training

19.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all learners

All staff will have training on the Government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

As a minimum, all staff will receive regular training about recognising and responding to mental health issues as part of their regular safeguarding and child protection training to enable them to keep learners safe.

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

All staff attend a safeguarding update during INSET in Term 1.

Volunteers will receive appropriate training, as applicable.

Approved contractors receive information on arrival regarding our expectations to share information with the DSL if they see or hear anything of concern whilst they are in our building.

19.2 The DSL and deputy/deputies

The DSL and deputy/deputies will undertake child protection and safeguarding training at least every 2 years.

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

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

19.3 Governors (School Improvement Committee) and Trustees

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding
- As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

19.4 Recruitment – interview panels

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

19.5 Staff who have contact with learners and families

All staff who have contact with children and families in relation to child protection and safeguarding will be offered supervision, which will provide them with support, coaching and training, promoting the interests of children and allowing for confidential discussions of sensitive issues.

The headteacher will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are

adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff .

20 Checking the identity and suitability of visitors

The Trust Managing Visitors guidance sets out our full requirements.

All visitors will be required to verify their identity to the satisfaction of staff on reception.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors not on our approved visitor list will be accompanied by a member of staff at all times and wear a red lanyard.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

21. Monitoring arrangements

This policy will be reviewed **annually** by Susie Beresford-Wylie, Trust Director for SEND, Safeguarding and Inclusion. At every review, it will be approved by the Trust Board.

22. Links with other policies

This policy links to the following policies and procedures:

Behaviour and exclusions

Staff Code of conduct

Complaints

Health and safety

Attendance

Online Safety and Acceptable Use

Equality and Diversity

Relationships and sex education

First aid

Curriculum

Whistleblowing

Anti-bullying

EYFS

Allegations of Abuse against Staff

Recruitment policy

Lettings policy

Privacy notices

Intimate Care Guidance

Artificial Intelligence Policy

Appendix A: types of abuse

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

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

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

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

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

Appendix B Specific safeguarding issues from KCSIE 2026

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this Annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or a deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate, the police) is made immediately

Keeping children safe in education 2026 (comes into force from 1 September 2026)

Appendix C Sexual Activity and the under 18S

A précis of the Law regarding Sexual Activity and U18s

The age of consent for all sex is 16, whether straight, gay, Trans or bi-sexual. The Sexual Offences Act 2003 makes it easier to prosecute people who pressure or force others into sexual activity.

Under 16s

If under 16 activity is consensual it may be less serious than if the child were under 13 but may nevertheless have serious consequences for the welfare of the young person. Consideration should be given in every case involving a child aged 13-15 as to whether there should be a discussion with other agencies and whether a referral should be made to children's social care.

The younger the child, and the wider the age gap between participants, the greater the concern (even 3 years' age difference may be worrying if one of the children is young and/or vulnerable). Where confidentiality needs to be preserved, a discussion can still take place as long as it does not identify the child (directly or indirectly).

Under 13s

A child under 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity. In all cases where the sexually active young person is under the age of 13, there must be a formal recorded consultation with the Children & Young People (Social Care) Dept,

16 & 17 Year Olds

Although sexual activity in itself is no longer an offence over the age of 16, young people under the age of 18 are still offered the protection of Child Protection Procedures under the Children Act 1989. Consideration still needs to be given to issues of sexual exploitation through prostitution, and abuse of power. Although they may be over 16, young people under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust/authority, or a family member as defined by the Sexual Offences Act 2003.

Sharing Information with Parents

If a young person is under 16, professionals should encourage the young person, at all points, to share information with their parents wherever safe to do so. However, parental advice is not needed if a young person under 16 can understand the issues and appreciate the consequences. This also applies to those living in care. Decisions to share information with a parent will be taken using professional judgement, and the Child Protection Procedures.

Giving Advice, Contraception &/or Access to Services to Under 16s

Under the Sexual Offences Act 2003, youth support workers **can** help young people under 16 (including under 13s but see section above) to seek contraception and sexual health advice/services (including giving out condoms), without being seen to facilitate an illegal act.

Any intervention must take place within the Fraser Guidelines and Child in Need/Child Protection Procedures

The Fraser Guidelines require the professional to be satisfied that

- The young person will understand the professional's advice;
- The young person cannot be persuaded to inform their parents;
- The young person is likely to begin, or to continue having, sexual intercourse with or without contraceptive treatment;
- Unless the young person receives contraceptive treatment, their physical or mental health, or both, are likely to suffer;
- The young person's best interests require them to receive contraceptive advice or treatment with or without parental consent.

Child protection concerns

When using Fraser guidelines for issues relating to sexual health, we will always consider any potential child protection concerns:

- Under age sexual activity is a possible indicator of child sexual exploitation and children who have been groomed may not realise they are being abused;
- Sexual activity with a child under 13 should always result in a child protection referral;
- If a young person presents repeatedly about sexually transmitted infections or the termination of pregnancy this may be an indicator of child sexual abuse or exploitation.

We will always consider any previous concerns that may have been raised about the young person and explore whether there are any factors that may present a risk to their safety and wellbeing.

We will always share child protection concerns with the relevant agencies, even if a child or young person asks us not to.

Appendix D: FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD AT Charborough Road Primary School

