



Child Protection and Safeguarding Children Policy

Date Issued: September 2023

Signed:

Chair of Governors

Signed:

Headteacher

Next Review by: September 2024

KEY CONTACTS:

Role	Name	Contact details
Designated Safeguarding Lead	Jayne Bevan Acting Headteacher	01452 521872 head@st-pauls.gloucs.sch.uk
Deputy Designated Safeguarding Leads	Karen Paterson Lead Practitioner for Pastoral Support & Wellbeing & Deputy Safeguarding Lead Kirsty Morrison Acting Deputy Headteacher	01452 521872 kpaterson@st-pauls.gloucs.sch.uk kmorrison@st-pauls.gloucs.sch.uk
Nominated governor for safeguarding and child protection	Pat Gifford	pgifford@st-pauls.gloucs.sch.uk
Chair of Governors	Mrs Margaret Ash	Chair@st-pauls.gloucs.sch.uk
Local Authority Designated Officer (LADO)	Nigel Hatton	01452 426994 amadmin@gloucestershire.gov.uk
Gloucestershire Safeguarding Children Helpdesk / MASH (for reporting concerns or advice during office hours)		01452 426565 childrenshelpdesk@gloucestershire.gov.uk
Out of Hours Emergency Duty Team (EDT) (For urgent concerns out of office hours)		01452 614194
Non-urgent enquiries	Community Social Work Team	01452 426263

CONTENTS

SECTION 1: Child Protection and Safeguarding Policy

- 1 Introduction
- 1.1 Definition of Safeguarding
- 2 Ethos
- 3 Scope of the policy
- 4 Policy aims
- 5 The legal framework
- 5.1 Statutory framework
- 6 Roles and responsibilities
- 6.1 School safeguarding responsibilities
- 6.2 Designated Safeguarding Lead
- 6.3 Safer Working Practice
- 7 Training in child protection
- 8 Online Safety and the use of mobile technology
- 9 Notifying parents or carers
- 10 Supporting children
- 11 What to do if you have a concern about a child
- 12 Early help for children and families
- 13 Confidentiality
- 14 Supporting staff
- 15 Allegations made against staff
- 16 Whistle blowing
- 17 Professional challenge and disagreements
- 18 Safer recruitment
- 19 Health & Safety
- 20 Monitoring and evaluation of this policy
- 21 Visitors to school
- 22 Safeguarding continuum of need

SECTION 2: Signs and Symptoms of Abuse

- 1 Signs of abuse
- 2 Other specific safeguarding issues
- 3 Further information:
 - Child sexual exploitation
 - Child criminal exploitation
 - Female genital mutilation
 - Gangs and youth violence
 - Radicalisation
 - E-Safety
 - Fabricated or induced illness
 - Forced marriage
 - Honour based abuse
 - Gender based violence
 - Under age marriage

- Faith abuse
- Teenage relationship abuse
- Peer on peer abuse
- Hate Crime
- Upskirting
- Dangerous Drugs Networks
- Sexual violence and sexual harassment between children in schools

4 Other information

5 Further advice regarding child protection

APPENDIX A: The Role of the DSL

APPENDIX B: Flow Chart for St Paul's Child Protection Procedures

APPENDIX C: Gloucestershire Safeguarding Continuum of Need

APPENDIX D: Responding to disclosures – guidance for staff

APPENDIX E: Allegations Management of abuse made against other children 'Child on Child Abuse'

APPENDIX F: Allegations against staff (including low-level concerns) policy

SECTION 1: CHILD PROTECTION AND SAFEGUARDING POLICY

1. INTRODUCTION

Safeguarding children is everyone's responsibility at St Paul's Church of England Primary School. Everyone who comes into contact with children and families has a role to play. **If you have any concerns about the welfare of a child, you must raise it with the DSL, Mrs Bevan. In her absence, the concern must be raised with Mrs Paterson or Miss Morrison.**

If at any point there is immediate risk of serious harm to a child a referral must be made to social care immediately or dial 999. Anybody can make a referral.

Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with other agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

Our school is a community and all those directly connected, staff members, governors, parents, families and pupils, have an essential role to play in making it safe and secure.

1.1. DEFINITION OF SAFEGUARDING

What is meant by 'Safeguarding'?

Safeguarding and promoting the welfare of children is defined as:

1. protecting children* from maltreatment.
2. preventing impairment of children's mental and physical health or development
3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
4. taking action to enable all children to have the best outcomes.

'Keeping Children Safe in Education' September 2023

*children includes everyone under the age of 18

What is meant by 'Child Protection'?

'Child protection refers to part of safeguarding and promoting welfare.

This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm'.

Working Together to Safeguard Children, 2018 Appendix A, Glossary

Safeguarding is what we do for all children and Child Protection is what we do for children who have been harmed or are at significant risk of being harmed.

2. OUR ETHOS

At St Paul's C of E Primary School, staff members are advised to maintain an attitude of "it could happen here" where safeguarding is concerned.

We believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

We recognise the importance of providing an environment within our school that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and to feel confident that they will be listened to.

We recognise that all adults within the school, including permanent and temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm.

We will work with parents to build an understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situation

3. SCOPE

In line with the law, this policy defines a child as anyone under the age of 18 years.

This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

4. POLICY AIMS

- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a central record is kept for audit.

5. THE LEGAL FRAMEWORK

Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to cooperate with the local authority to improve the well-being of children in the local authority area.

Under section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school or further education institution to supply information in order to perform its functions. This must be complied with.

This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:
Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, 2018
Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2023

5.1. STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of children, we will act in accordance with the following legislation and guidance:

- **The Children Act 1989 and the 2004 Amendment** which provides a framework for the care and protection of children
- **Education Act 2002** (section 175) which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- **The School Staffing (England) Regulations 2009**, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- **The Education (Pupil Information) (England) Regulations 2005**
- **Gloucestershire Safeguarding Children Partnership (GSCP)** (Inter-agency Child Protection and Safeguarding Children Procedures) (www.gloucestershire.gov.uk/gscp)
- **Keeping Children Safe in Education**: statutory guidance for schools and colleges (DFE guidance September 2023)
- **Working Together to Safeguard Children** (DfE 2018)
- What to do if you are worried a child is being abused (2015 advice for practitioners)
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 47 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
- **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 radicalization and extremism
- **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
- The **Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018** (referred to in this policy as the "2018 Childcare Disqualification Regulations") and **Childcare Act 2006**, which set out who is disqualified from working with children
- Requirements relating to safeguarding and welfare in the **statutory framework for the Early Years Foundation Stage**
- The locally agreed multi-agency procedures that have been put in place by the 3 safeguarding partners – <https://www.gloucestershire.gov.uk/gscp/>

Working Together to Safeguard Children (DfE 2018) requires all schools to follow the procedures for protecting children from abuse which are established by the Safeguarding Partners. Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

Furthermore, **Keeping Children Safe in Education (DfE September 2023)** places the following responsibilities on all schools:

- All staff members should be aware of systems which support safeguarding and these should be explained as part of induction.
- All staff must understand the role of the DSL (Designated Safeguarding Lead) and the DDSLs (Deputy Designated Safeguarding Leads).
- All staff must recognise the contribution that the school can make to inter-agency working by providing a co-ordinated offer of early help for children with additional needs
- Overall responsibility for safeguarding and child protection matters rest with the Designated Senior Person (referred to in 'Keeping Children Safe in Education (DFE, September 2021 as Designated Safeguarding Lead'). This responsibility cannot be delegated.
- Staff with the designated safeguarding lead responsibility should undergo updated child protection training at least annually.
- Schools should be aware of and follow the procedures established by the 3 safeguarding partners that form the GSCP (Gloucestershire's Safeguarding Children Partnership)
- All staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
- All concerns or discussions, decisions made and reasons for those decisions must be recorded by staff using the school's electronic reporting system CPOMS (Child Protection Online Management System). Staff must be able to distinguish between a CONCERN, RISK OF HARM or IMMEDIATE DANGER.
- Schools should have procedures (of which all staff are aware) for handling suspected cases of abuse of pupils, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse.

6. ROLES AND RESPONSIBILITIES

6.1 School Safeguarding Responsibilities

The school will:

- **Abide by the Keeping Children Safe in Education September 2023 guidance**

Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children 2018. Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. (KCSIE'23 Part one).

- Give all staff a copy of Part 1 of KCSIE'23 and ensure that it is read and understood and knowledge of and access to all of KCSIE'23 as well as Annex A and Part 5 'Child on Child sexual violence and sexual harassment.'
- Have a child protection/Safeguarding policy with procedures which are in accordance with government guidance and refer to locally agreed inter-agency procedures put in place by the Safeguarding Partners
- Appoint a lead Governor responsible for safeguarding practice within the school
- Ensure that any weaknesses in child protection are remedied immediately
- Appoint a Designated Safeguarding Lead who is a member of the Leadership Team and Deputies to provide adequate cover
- Ensure that the DSL (usually) leads on the Prevent agenda
- Have a named member of staff to support children who are Looked After Children (Designated teacher) who will work closely with the DSL where this post is held separately
- Require teachers, staff and volunteers to read and implement the appropriate procedures as outlined by the Safeguarding Partners
- Ensure that all members of staff, (including supply teachers) peripatetic staff, contractors and volunteers have completed Disclosure and Barring Service checks as per the safer recruitment guidance and that contacts within extended services require safer recruitment and safeguarding compliance
- Undertake relevant safer recruitment and allegations management training

- Ensure any external contractors using or on school premises are signed up to Safeguarding Procedures and ensure they follow guidelines on the use of restraint and comply with the safeguarding requirements, i.e. after school clubs
- Ensure staff and volunteers comply with Safer Working practice for adults who work with children and young people in Education Settings
- Sign up to the Gloucestershire Safeguarding Children Partnership (GSCP) alerts
- Ensure that the relevant staff have undertaken appropriate training to contribute to multi-agency assessments of children
- Ensure management of allegations procedures are implemented
- Ensure staff work to the agreed Behaviour policy/code of conduct and safer working procedures
- Recognise that children with special educational needs may be especially vulnerable to abuse and expect staff to take extra care to ensure their needs are protected
- Have and use an Anti-Bullying Policy responding to any complaint of bullying or prejudice within the school.
- Have an e-safety policy in line with Safeguarding Partners requirements
- Have a Whistle Blowing Policy where it is safe to discuss concerns
- Be aware of the needs of vulnerable groups, identify and action for all identified
- Make policies available to parents and pupils via the school website
- Provide education to children about safeguarding issues
- Ensure the child's wishes and feelings are taken into account in respect to individual matters as well as safeguarding generally
- Undertake an annual audit of safeguarding, using the GSCP Safeguarding Self Evaluation audit tool (or similar) which will be shared with the Governing body leading to appropriate actions to ensure that the school is meeting all the requirements in line with national guidance, legislation and Safeguarding Partner guidance
- Undertake a safeguarding report for the Governing Body at least annually and review the safeguarding policy at least annually
- Standing item on safeguarding at full governing body meetings
- Governors to have read and understood 'Keeping Children Safe in Education September 2023', 'Working Together to Safeguard Children' and undertaken relevant training

6.2 Designated Safeguarding Lead (DSL)

The school's lead person with overall responsibility for child protection and safeguarding is the **DSL**. We have 1 DSL and 2 Deputy DSLs to ensure there is appropriate cover for this role at all times. The DSL's responsibilities are described in appendix A.

The DSL will usually be on our school's leadership team and their role of DSL will be explicit in their job description. This person should have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children. The DSL is also responsible for:

- Ensuring that written records of concerns are kept about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely until the child's 25th birthday, and are copied on to the child's next school or college.
- Liaising with other agencies and professionals.
- Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- Ensuring that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
- Organising child protection induction, and update training every 3 years, for all school staff. Provide annual updates and notifications of any necessary changes, reminders being made available as required.

- Ensuring all new staff, volunteers and Governors will receive Safeguarding induction to ensure understanding of the child protection/safeguarding policy. They will be provided with copies of KCSIE 23 Parts 1 & 5 to read, as a minimum requirement. The DSL is responsible for ensuring that all staff have signed a record to say they have read and understood these documents.
- Referring a child if there are concerns about possible abuse, to the Children's Helpdesk. Referrals will be made in writing following an initial telephone call using a MARF (Multi agency referral form) through the online 'Liquid Logic Portal'.

6.3 The Governing Body

The Governing Board 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
- 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 governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The 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 3 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 children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.
- All governors will read Keeping Children Safe in Education in its entirety.

The school has a **nominated governor** responsible for safeguarding to champion good practice, to liaise with the head teacher and to provide information and reports to the governing body. Safeguarding is a standing item on the governing body agenda and is reported on at each full governing body meeting (FGB).

The **headteacher** will ensure that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities. It is also the responsibility of the headteacher of early years providers to oversee the safe use of technology, mobile phones and cameras in the setting.

The **governing body** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

All staff members, governors, volunteers and external providers know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.

The DSL's who are involved in recruitment and at least one member of the governing body will also complete Safer Recruitment Training to be renewed every 5 years.

6.3. SAFER WORKING PRACTICE

- All staff & volunteers share that importance of safer working practices in that it ensures that pupils are safe
- All staff & volunteers are aware of the expectations of this guidance and that they are working within this, that relevant training is given and advice, guidance or sanctions applied where guidance is not followed
- All staff, volunteers and Governors are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- All staff & volunteers work in an open and transparent way
- All staff & volunteers discuss and/or take advice from school management over any incident which may give rise to concern
- All staff & volunteers record any incidents with the actions and decisions made
- All staff & volunteers apply the same professional standards regardless of gender, race, disability or sexuality
- All staff & volunteers are aware of confidentiality policy
- All staff & volunteers are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them
- All staff & volunteers adhere to the relevant e-safety policies related to the use of technology both within and outside of school

7. TRAINING IN CHILD PROTECTION

The DSL, Deputy DSLs and nominated Governor have undertaken the compulsory training delivered through the GSCE followed by biannual updates.

All members of staff and volunteers are provided with child protection awareness information at induction, including in their arrival pack, the school safeguarding statement so that they know who to discuss a concern with.

All other staff and governors, have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

All members of staff, volunteers, and governors know how to respond to a pupil who discloses abuse.

Staff knowledge and understanding of safeguarding policy and procedure are checked through monitoring the school processes and through staff questioning and questionnaires. Annual training updates are provided to all staff through feedback from GSCP forums.

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Child Protection Policy. Details of where this policy can be found are published in the school newsletter and on the school website.

We will ensure that child protection type concerns or allegations against adults working in the school are referred to the LADO for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.

Our procedures are reviewed at least annually and will be updated as soon as necessary. The name of the designated members of staff for Child Protection, the Designated Safeguarding Leads, will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

All new members of staff will be given a copy of our safeguarding statement, and child protection policy, with the DSLs names clearly displayed, as part of their induction into the school.

The policy is available publicly either on the school website. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the school website.

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 wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones and kindles for the whole school community
- 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, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of

nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
 - Staff in EYFS must never have personal mobile devices accessible when working with children
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology, such as Kindles
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy which can be found on our website.

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. SUPPORTING CHILDREN

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will support all children by:

- Providing high-quality and accessible pastoral support by properly trained staff
- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.

Any pupil at St Paul's C of E Primary School may benefit from Early Help, however, every member of staff is expected to be particularly alert to the potential need for Early Help for any child who:

- Is in care
- Has Special Educational Needs and/or Disabilities
- Is missing from education (CME)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance that presents challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs and alcohol themselves
- Has returned home to their family from care
- Is privately fostered
- Has a family member in prison

Pupils with special educational needs and disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Safeguarding children and young people with SEN, requires understanding, foresight and reflection. Keeping children safe from harm in schools relies on all staff being able to recognise the raised risk factors, identify young people with the greatest levels of risk and create focussed action plans that sufficiently respond to their needs. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Pupils with English as an additional language (EAL) and in the Early Years (EYFS)

It is important to recognise that pupils with EAL and young children may have difficulties in communication or may be non-verbal. We need therefore to be especially vigilant when caring for these children and be alert to changes in appearance and behaviour.

An effective partnership between the SENCo in school, Designated Safeguarding and Pastoral leads should identify children and siblings with the highest risk factors in the above groups. By linking the information, resources such as interpreters, sign language or visual cues, can be effectively focused to provide the best possible support and outcomes.

Pupils with a social worker

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

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

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

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

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 (Miss Hannah Apperley), 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

11. WHAT TO DO IF YOU HAVE A CONCERN ABOUT A CHILD

The school will then carry out the following procedures (see appendix B – St Paul's safeguarding flow diagram):

Staff member	What action to take if you have concerns
Any member of staff, governor, volunteer, contractor or activity provider	<ol style="list-style-type: none"> 1. Discuss your concerns with the DSL, Jayne Bevan, or in their absence, with the Deputy DSLs, Karen Paterson or Kirsty Morrison as soon as possible, before the child leaves for the day. It is important that the child is not sent home at the end of the day without taking the right protective action. 2. Log these concerns on CPOMS (Child Protection Online Management System) immediately and notify the DSL of written documentation through CPOMS. 3. <u>If the DSL or their deputy is not available, you should contact the Children's Social Care Duty and Assessment Team yourself for a consultation about the action you need to take. Inform the DSL about your consultation and what actions you have taken.</u>
Designated safeguarding lead	<ol style="list-style-type: none"> 1. You are concerned that the child is at risk of significant harm (Level 4 of the Continuum of need) <ol style="list-style-type: none"> 1.1 Contact the relevant Duty and Assessment Team immediately. 1.2 If you believe that the child is in immediate danger, or you suspect a crime has been committed, you must also contact the police immediately. 1.3 If the Duty and Assessment Team accepts your contact as a referral, send them a completed Multi-Agency Service Request form (available from https://www.gloucestershire.gov.uk/gscp/) 1.4 The Duty and Assessment Team may decide, in discussion with you, that the child's needs are at Level 2 or 3 of the Continuum of Need and the school is better placed to provide support. See points 2.5 and 2.6 below for further action. 1.5 Record all your discussions and decision-making on CPOMS. Continue to update the child's CPOMS file and chronology as the investigation and the resulting work carry on. 2. You believe the child is not at risk of significant harm, but the child or their family may need support (Level 2 or 3 of the Continuum of Need) <ol style="list-style-type: none"> 2.1 Use the Continuum of Need tool to identify the level of need. 2.2 Discuss your concerns with senior colleagues in another agency, if necessary.

	<p>2.3 Contact the Duty and Assessment Team for a consultation, without necessarily identifying the child in question, in order to develop an understanding of the child's needs and circumstances.</p> <p>2.4 If the Duty and Assessment Team accepts your contact as a referral for social care assessment, send them a completed Multi-Agency Service Request form (available from https://children.gloucestershire.gov.uk/web/portal/pages/home as above.)</p> <p>2.5 If your consultation results in the decision that the child and family are in need of help at Level 2 or 3 of the Continuum of Need, provide additional support in the school and/or refer the child or their family to other agencies providing early help services.</p> <p>2.6 Record all your discussions and decision-making on CPOMS. Continue to update the child's CPOMS file and chronology as the investigation and the resulting work carry on.</p>
--	--

Please note that any member of the public is able to make a direct referral to Gloucestershire Safeguarding Children's Board as outlined in section 1, step 3 of the above.

DEALING WITH A DISCLOSURE MADE BY A CHILD – ADVICE FOR ALL MEMBERS OF STAFF

If a child wishes to confide in you the following guidelines should be adhered to:

- Listen to what is being said without displaying shock or disbelief.
- Only ask questions when necessary to clarify.
- Accept what is being said.
- Allow the child to talk freely – do not put words in the child's mouth.
- Reassure the child that what has happened is not his or her fault.
- Do not make promises that you may not be able to keep.
- Do not promise confidentiality – it may be necessary to refer the child to Children's Social Care.
- Stress that it was the right thing to tell.
- Do not criticise the alleged perpetrator.
- 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.
- Explain what has to be done next and who has to be told.
- Inform the DSL without delay.
- Update CPOMS with written records of your discussions and notify the DSL and key staff. Alternatively, if appropriate, make a referral to children's social care and /or the police directly, and tell the DSL as soon as possible that you have done so. Again, add this record to CPOMS.
- Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL.

DISCUSSING CONCERNS WITH THE FAMILY AND THE CHILD – ADVICE FOR THE DESIGNATED SAFEGUARDING LEAD

In general, you should always discuss any concerns the school may have with the child's parents. They need to know that you are worried about their child. However, you should not discuss your concerns if you believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.

If you make a decision not to discuss your concerns with the child's parents or carers this must be recorded in the child's CPOMS record with a full explanation of your decision.

It is important to consider the child's wishes and feelings, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.

When talking to children, you should take account of their age, understanding and preferred language, which may not be English. It is also important to consider how a disabled child may need support in communicating.

How you talk to a child will also depend on the substance and seriousness of the concerns. You may need to seek advice from Children's Social Care or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.

If concerns have arisen as a result of information given by a child, it is important to reassure the child but not to promise confidentiality.

It is expected that you discuss your concerns with the parents and seek their agreement to making a referral to Children's Social Care, unless you consider that this would place the child at increased risk of significant harm.

You do not need the parents' consent to make a referral if you consider the child is in need of protection, although parents will ultimately be made aware of which organisation made the referral.

If parents refuse to give consent to a referral but you decide to continue, you need to make this clear to Children's Social Care.

If you decide to refer the child without the parents' consent, make sure to record this with a full explanation of your decision.

When you make your referral, you should agree with Children's Social Care what the child and parents will be told, by whom and when.

12. EARLY HELP FOR CHILDREN AND FAMILIES

Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our school or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later.

Our school will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children 2018* and local guidance, to any child who needs it.

We will pool our knowledge within the school and with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them.

We will work closely with targeted early help services and Children's Social Care if we feel families need more support and input, or children are at risk of harm, and we will continue to provide support if other services are also needed.

Targeted support is also provided by family keyworkers in specialist services, for example Probation, Gloucestershire Police, and by School Nurses and Family Support Health Practitioners. These services may lead a plan of support in a similar way to targeted early help services.

Our school will [refer any child with needs at Level 3 on the Continuum of Need](#) to a targeted early help service and work with the service in any early help planning they may undertake to support the child.

We will talk to the family about referral to a targeted early help service and explain that there may be a need to involve other professionals, including talking to a social worker about our concerns. We will seek the family's consent for the referral.

If the family does not consent to an early help service, we will make a judgement about whether the needs of the child will escalate or the child will become unsafe without help. If our judgement is that the needs or concerns will escalate, then we will contact the Children's Social Care Duty and Assessment Team in our area for a consultation with a qualified social worker in order to make a shared decision about whether the level of concerns calls for a referral to Children's Social Care.

CHILDREN'S-SOCIAL-CARE-LED RESPONSES TO CONCERNS ABOUT A CHILD

Once Children's Social Care has accepted our referral as needing a social-care-led response (Level 4 of the Continuum of Need), a senior social work practitioner and their manager will evaluate the concerns to identify the sources and levels of risk and to agree what protective action may be necessary.

The evaluation of concerns and risks involve deciding whether:

- the child needs immediate protection and urgent action is necessary; or
- the child is suffering, or at risk of suffering, significant harm and enquiries need to be made under section 47 of the Children Act 1989; or
- the child is in need and should be assessed under section 17 of the Children Act 1989.

We will cooperate with Children's Social Care and the police in any emergency action they take using their legal powers for immediate protection of the child.

We will participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child and their family to plan the response to concerns.

We will share information about the child and their family for section 47 enquiries and family assessments undertaken by Children's Social Care.

We will ensure that a relevant staff member participates in all initial and review child protection conferences, if we are invited to attend. The staff member will work together with other agencies to discuss the need for and agree to an outcome-focused child protection plan and will ensure that the child's wishes and views are considered in their own right in planning.

If we are members of the core group to implement a child protection plan, we will ensure a relevant staff member participates in all core group meetings.

We will ensure that we complete all actions allocated to us as part of the outcome-focused plan, whether a child protection plan or a family support plan, in a timely way.

We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.

INFORMATION SHARING

At St Paul's, all staff recognise that information sharing is vital in identifying and tackling all forms of abuse and neglect. The school and staff will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

As part of this duty, the school is fully aware that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, the school and staff also recognise that The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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.

Relevant staff have received training to ensure that they have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR.

Staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.

Staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing 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.

The school's electronic system is fully compliant with The Data Protection Act 2018 and GDPR.

13. CONFIDENTIALITY

We recognise that all matters relating to child protection are confidential. The Headteacher or DSLs will disclose any information about a child to other members of staff on a need to know basis (Guidance about sharing information, can be found in the DfE booklet 'Information sharing guidance for practitioners and managers' DCSF-00807-2008).

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with GSCB on this point.

MULTI-AGENCY WORKING

Everyone at St Paul's is committed to developing effective partnership working with relevant agencies in the best interest of children and young people. Effective multi-agency working and communication helps to safeguard young people. New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within a local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

The GSCP (Gloucestershire Safeguarding Children Partnership) website sets out all of the child protection referral processes and also all of the relevant forms. This is a live website and is regularly updated so should not be printed [Gloucestershire Safeguarding Children Partnership \(GSCP\) - Gloucestershire Safeguarding Children Partnership](#). KCSIE'23 also provides clear guidance.

Gloucestershire Encompass Commitment

As part of St Paul's C of E Primary School's commitment to keeping children safe we have signed up to implement the principles and aims of the Gloucestershire Encompass Model.

Operation Encompass aims to support children and young people who are affected by domestic abuse. Witnessing or experiencing domestic abuse is really distressing for a child or young person, who often see the abuse, hear it from another room, see a parent's injuries or distress afterwards, or can be physically hurt by trying to stop the abuse.

As a result, following any domestic abuse incident being reported to the police, the Police will make contact with one of the Education Researchers within the Gloucestershire MASH, who will then on behalf of the police communicate relevant, necessary and proportionate information to nominated school staff.

This will ensure that the school is made aware at the earliest possible opportunity and can subsequently provide support to children in a way that means they feel safe and listened to.

Each school has members of staff who have been fully trained in liaising with police and Children's Social Care when required, and will ensure that the necessary support is made available to the child or young person following the notification of a domestic abuse incident.

In signing up to Gloucestershire Encompass the Governing Body and Senior Leadership Team:

- Endorse the Gloucestershire Encompass Model and support the Key Adults in our school to fulfil the requirements of the Gloucestershire Encompass Protocol
- Promote and implement Gloucestershire Encompass processes and use these in accordance with internal safeguarding children processes
- Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection.

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 the DDSL or a member of the SLT and/or seek advice from local authority children's social care. Make a referral to the local authority children's social care, if appropriate. Inform the DSL or deputy as soon as is 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.

14. SUPPORTING STAFF

All members of staff are trained in, and expected to adhere to the guidance laid out in the "Guidance for safer working practice for those working with children and young people in education settings" document. This document seeks to ensure that the responsibilities of educational settings leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children.

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL/DDSLs and to seek further support as appropriate.

15. ALLEGATIONS MADE AGAINST STAFF (see APPENDIX F for staff allegations policy)

All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

All Staff should be aware of the 'Guidance for Safer Working Practice' which is used as a basis for the school's own Behaviour Management.

[Professional and Personnel Relationships \(wetherbyhigh.org.uk\)](http://wetherbyhigh.org.uk)

16. WHISTLE BLOWING

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

Whistle-blowing re the Headteacher should be made to the Chair of the Governing Body, **Mrs Margaret Ash**, whose contact details are readily available to staff in the school office.

If staff members have concerns about another staff member, then this should be referred to the Headteacher.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Leadership Team. Appropriate whistleblowing procedures are suitably reflected in the safeguarding induction pack and staff code of conduct policy to enable this to happen.

Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

The [NSPCC whistleblowing helpline](https://www.nspcc.org.uk) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

17. PROFESSIONAL CHALLENGE AND DISAGREEMENTS

Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.

We will promote a culture within our school that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of child protection in the school. This may include raising concerns about decisions, action and inaction by colleagues about individual

children. If necessary, staff members will speak with the Designated Safeguarding Lead, the head teacher, the chair of governors or with the Local Authority Designated Officer.

Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences and case management.

If there are any professional disagreements with practitioners from other agencies, the DSL or the head teacher will raise concerns with the relevant agency's safeguarding lead in line with guidance in the Gloucestershire Escalation Policy.

18. SAFER RECRUITMENT

Our school has robust recruitment and vetting procedures to help prevent unsuitable people from working with children.

Our job advertisements and application packs make explicit reference to the school's commitment to safeguarding children, including compliance with the Disclosure and Barring Service (DBS) process and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2023*.

At least one member on every short listing and interview panel will have completed safer recruitment training. The head teacher is responsible for ensuring that safer recruitment training is kept up to date.

The School Business Manager, overseen by the head teacher and the nominated governor for child protection is responsible for ensuring that our **single central record** is accurate and up to date.

19. HEALTH & SAFETY

Our Health & Safety policy, as defined by the GCC document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school and when undertaking school trips and visits.

20. MONITORING AND EVALUATING THE EFFECTIVENESS OF THIS POLICY

Our Child Protection Policy and Procedures will be monitored and evaluated by:

- Governing Body visits to the school
- SLT 'drop ins' and discussions with children and staff
- Pupil surveys and questionnaires, including the Gloucestershire on-line pupil survey (OPS)
- Scrutiny of Attendance data
- Scrutiny of range of risk assessments
- Scrutiny of the Single Central Record (SCR)
- Completion of the GSCB annual Section 175 audit
- Scrutiny of GB minutes
- Logs of bullying/racist/behaviour incidents for SLT and GB to monitor
- Review of training undertaken by all staff
- Review of parental concerns and parent questionnaires
- Review the use of the Thrive room and school pastoral support systems
- Information and updates from GSCB DSL forums

21. VISITORS TO THE SCHOOL

During school hours, all access gates and doors into the school are kept locked except at the beginning and end of the school day and at break times when access doors are manned by designated members of staff. Individual visitors to the school (e.g. parents, prospective pupil parents, sponsors, contractors, maintenance workers and similar casual visitors) are able to gain entry through the main door only when it is opened by office staff who will then, if appropriate, escort them into the school. **At no point will such visitors be left alone with children.**

Coloured lanyards are worn by all adults in school. The colours are as follows:

- Green = all school staff
- Yellow = DBS holders whose information is kept on the school's SCR or whose DBS has been checked and recorded. These might be regular visitors to school. E.g. peripatetic music teachers, sports coaches, regular supply teachers etc. Can move around school unescorted.
- Red = no DBS available so therefore should not be left on their own in school at any time.
- Black = school Governors

20. SAFEGUARDING CHILDREN CONTINUUM OF NEED

The Safeguarding Children Continuum of Need has been developed so that everyone working with children in Gloucestershire has a common language for understanding the needs and risks surrounding children and their families.

For example, if the school has concerns about a child and needs advice or support from a Duty and Assessment social worker, they will use the Continuum of Need as a guide to understand the school's concerns and provide advice about what to do or to decide whether the child and family need social care involvement. The Continuum of Need does not replace professional judgement, but it is intended to support decision-making and discussions between services and practitioners.

It is important that staff members are familiar with the Continuum of Need tool. It comes in two parts – a windscreen tool showing levels of need (see below) and an indicator tool describing a range of conditions about the child and family that the school (and other practitioners the school has discussions with) can use to identify their level of need.

The Continuum of Need tool, including the windscreen and indicators, and detailed guidance are available in appendix C.

The Continuum of Need shows that a child's or family's additional needs can be on a range from none to very high, and that needs can shift from early help to child protection and back to preventative early help. It covers children whose needs are increasing as well as children whose needs are decreasing after Children's Social Care involvement. The Continuum of Need will help practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.

The Continuum of Need identifies four levels of need.

Level 1:

- children who are achieving expected outcomes
- their needs are met by their parents and by accessing universal services such as health and education
- they do not have additional needs

Level 2:

- children with additional needs
- parents need professional support or guidance to help them meet their children's needs
- extra support can usually be provided by agencies that already know the family, e.g. their pre-school, school or college or NHS community services such as Health Visiting

Level 3:

- children with multiple and complex needs
- children and parents need targeted early help or specialist services to meet the children's needs
- needs are met through multi-agency support and the use of Early Help Plans

Level 4:

- children with acute needs, including those in need of protection
- children and parents need multi-agency responses which include specialist intervention from Children's Social Care through the family assessment process

By referring to the Continuum of Need and indicators, the school can identify when assessment and support for a child and family need 'stepping up' to a referral to Social Care and when the needs of a child and their family have been reduced enough for them to be 'stepped down' to early help services.

SECTION 2: SIGNS AND SYMPTOMS OF ABUSE

Four distinct categories of abuse are:

1. Neglect.
2. Physical Abuse.
3. Sexual Abuse.
4. Emotional Abuse.

In a situation where police are present in the school, no interview with any pupil shall take place until parents/carers have been informed and given the opportunity to attend. This does not apply in those cases where the pupil has made allegations about a parent/carer.

In any event, no such interview shall take place without an appropriate adult being in attendance.

(The word "interview" in the context of the police means "to interrogate a person about a specific event").

1. SIGNS OF ABUSE IN CHILDREN:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

2. OTHER SPECIFIC SAFEGUARDING ISSUES

School staff members need to be aware of specific safeguarding issues and be alert to any risks.

The government website, [GOV.UK](https://www.gov.uk), has broad government guidance on a variety of issues. The following is not a comprehensive list and staff members should search the GOV.UK website for advice on other issues.

- child sexual exploitation (CSE) and child criminal exploitation (CCE)
- bullying including online bullying
- domestic abuse
- drugs
- homelessness
- fabricated or induced illness
- faith abuse

- so-called 'honour-based' abuse (including female genital mutilation (FGM) and forced marriage)
- gangs and youth violence
- County Lines
- gender-based violence/violence against women and girls (VAWG)
- mental health
- peer on peer abuse/child on child abuse
- private fostering
- children missing in education (CME)
- preventing radicalisation and the Prevent duty
- sexual violence and sexual harassment between children in schools
- teenage relationship abuse
- trafficking
- upskirting

3. FURTHER INFORMATION:

3.1 Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include underage sexual activity, inappropriate sexual or sexualised behaviour, receiving unexplained gifts or gifts from unknown sources, having multiple mobile phones and worrying about losing contact via mobile, having unaffordable new things (clothes, mobile) or expensive habits, changes in the way they dress, seen at known places of concern, moving around the country, appearing in new towns or cities, not knowing where they are, getting in/out of different cars driven by unknown adults, having older boyfriends or girlfriends, contact with known perpetrators, hanging out with groups of older people, or anti-social groups, or with other vulnerable peers, associating with other young people involved in sexual exploitation, truancy, exclusion, disengagement with school, opting out of education altogether.

Prevention of CSE at St Paul's includes the use of the Gloucestershire CSE screening tool. If the school was concerned about CSE, we would contact GSCE and the Gloucestershire Constabulary CSE team.

3.2 Child Criminal Exploitation (CCE)

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

This abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For indicators of CCE, please see the section above on CSE.

If the school was concerned about CCE, we would contact GSCE and the police, if necessary.

3.3 Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. This practice involves procedures that intentionally alter/injure the female

genital organs for non-medical reasons. FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK. Circumstances and occurrences that may point to FGM happening are child talking about getting ready for a special ceremony, Family taking a long trip abroad, child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan), knowledge that the child's sibling has undergone FGM, child talks about going abroad to be 'cut' or to prepare for marriage.

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

Indicators that FGM has already occurred include:

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

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

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

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

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

If the school was concerned about FGM, we would contact GSCP immediately.

3.4 Gangs and Youth Violence

Primary schools are also increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Preventive work undertaken at St Paul's to prevent negative behaviour from escalating and becoming entrenched, include programmes aimed to improve social and emotional skills and programmes which help children understand risk and make safe choices. This is supported by our safeguarding curriculum

3.5 Radicalisation:

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice. The threats to children & young people take many forms, not only the high profile incidents of those travelling to countries such as Syria and Iraq to fight, but on a much broader perspective also. The internet, in particular social media, is being used as a channel to promote and engage. Often this promotion glorifies violence, attracting and influencing many people including children and in the extreme cases, radicalising them. Research concludes that children can be trusting and not necessarily appreciate bias that can lead to them being drawn into these groups and adopt these extremist views, and in viewing this shocking and extreme content may become normalised to it.

What is Prevent?

Prevent is about safeguarding people and communities from the threat of terrorism. Prevent is 1 of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support; and
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

Prevent covers all forms of terrorism and extremism and some aspects of non-violent extremism. The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

Prevent uses a range of measures to challenge extremism including:

- Supporting people who are at risk of being drawn into terrorist or extremist activity through the Channel process, see the What is Channel section to find out more about this
- Working with and supporting community groups and social enterprise projects who provide services and support to vulnerable people

- Working with faith groups and institutions to assist them in providing support and guidance to people who may be vulnerable; and
- Supporting local schools, local industry and partner agencies through engagement, advice and training.

Preventing extremism in schools and children's service

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.terrorism@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-led

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures, including discussing their concerns with the DSL.

3.6 E-Safety:

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Any kind of abuse that involves internet, mobile, digital or other technology should be treated the same as any other abuse. Everyone should take responsibility for ensuring that children are safe when using technology and it should not just be left to those responsible for IT.

3.7 Fabricated or Induced Illness:

Is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3.8 Forced Marriages*:

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. This should not be confused with arranged marriages between consenting adults.

3.9 Honour-Based Abuse (HBA):

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

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

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

Warning signs of honour-based abuse include: broken communication between victim and friends, absence from education/the workplace, criticism of the victim for 'western' adoption of dress/make-up, restrictions in leaving the house or being accompanied outside the home, depressive or suicidal tendencies in an otherwise happy person.

3.10 Gender Based Violence:

Violence directed against a person because of that person's gender (including gender identity/expression) or as violence that affects persons of a particular gender disproportionately. Women and girls, of all ages and backgrounds, are most affected by gender-based violence. It can

be physical, sexual and/or psychological, and includes violence in close relationships; sexual violence (including rape, sexual assault and harassment or stalking); slavery; harmful practices, cyberviolence and harassment using new technologies and forced marriages, female genital mutilation (FGM) and 'honour' based abuse.

3.11 Under-age Marriages*:

In England, a young person cannot have a sexual relationship or legally get married until they are 16 years old.

3.12 Faith abuse:

Some faiths believe that spirits and demons can possess people (including children) and that prayer can help. Any emotional or physical violence used as part of the above is unacceptable. This is abuse even if the intention was to help the child

3.13 Teenage relationship abuse*:

Teenage relationship abuse is when there is actual or threatened abuse within a romantic relationship or a former relationship. One partner will try to maintain power and control over the other. This abuse can take a number of forms: physical, sexual, financial, emotional or social. This includes coercive and controlling behaviours. The current UK definition of domestic abuse includes incidences between people aged 16 or over, but it is important to note that violence and abuse can occur in relationships between children and young people at any age.

3.14 Child-on-Child Abuse

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

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

Abuse is abuse and will never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'.

3.15 Hate Crime

The term 'hate crime' can be used to describe acts of violence, hostility or prejudice directed at people because of who they are or who someone thinks they are. The perpetrator is motivated by

hostility or demonstrates hostility towards the victim's disability, race, religion, sexual orientation or transgender identity. A hate crime can include verbal abuse, intimidation, threats, harassment, assault and bullying, as well as damage to property.

3.16 Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

3.17 Dangerous Drugs Networks

Dangerous Drugs Networks (DDNs) are drug dealing gangs who target vulnerable people in order to set up drug distribution networks. These criminals, often from outside the county, use the vulnerability of a person to tempt them. They quickly become part of this network and become indebted to the gang with no escape. DDNs are often violent or threatening so early intervention is vitally important to protect the individuals. Whilst it is predominantly teenagers who are targeted, it is imperative that Primary settings are vigilant and act on any changes in behaviour, attitude, demeanour etc appropriately.

3.18 Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

***Where primary school age pupils make disclosures or raise concerns about older siblings, the school will make links with any relevant organisations and follow through these concerns.**

4 OTHER INFORMATION:

Private Fostering: is an arrangement made for a child aged 16 or under, or under 18 if the child has a disability, to be cared for by someone other than a close relative. It is when the arrangement has been set up with the intention that it continues for longer than 28 days and where there is parental consent to the arrangement. Private fostering is regulated by the Children's Act 2004 and the Children and Young People's Directorate has certain responsibilities to ensure privately fostered children are safe. If you think a child or young person is privately fostered, you have a duty to make a referral to The Children's Helpdesk on 01452 426565 OR The Private Fostering Co-ordinator on 01452 425320 OR by email to private.fostering@gloucestershire.gov.uk.

Children missing from education

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

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

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

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

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

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

Non-collection of children

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

Make all reasonable efforts to contact the parent.

If the child's parent/carer cannot be contacted, we will contact the second contact number. Messages will be left if appropriate giving details of non-collection.

If the parent or a named contact cannot be contacted before 5pm, social care will be contacted.

Children not collected will be supervised by a member of staff at all times (office staff until 4pm and then either Keyworker or a member of SLT), until collection.

Details of the incident should be recorded on CPOMS under the tag, 'Pastoral Care Concern: Child not Collected'.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

If a child goes missing, we will:

Organise a search party to conduct the following:

- Search all areas of the school grounds
- Search the immediate area outside of school
- Visit the child's address
- Contact the parents/carers and Police
- Maintain an open line for contacting search party leader on the school site

Staff conducting searches outside of the school grounds will be in pairs. They will take phones with them to be able to contact the school.

5 FURTHER ADVICE REGARDING CHILD PROTECTION:

GSCP (Gloucestershire Safeguarding Children Partnership): [Gloucestershire Safeguarding Children Partnership \(GSCP\) - Gloucestershire Safeguarding Children Partnership](#)

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Safeguarding and child protection is at the core of all that we do at St Paul's and therefore relates to all policies. There are particularly important links between this child protection policy and the following policies:

Whistle Blowing, Acceptable Use, Child Missing in Education protocol, E-Safety, Inclusion, Anti-Bullying, Medication, Safer Recruitment, Attendance, Health and Safety, Teaching & Learning information (for information on how the curriculum supports this policy).

For further information and guidance please refer to:

Annex A – Further Information in KCSiE September 2023 p. 136 onwards.

APPENDIX A. THE ROLE OF THE DSL AT ST PAUL'S C OF E PRIMARY SCHOOL

1 MANAGING REFERRALS

- 1.1 Refer all cases of suspected abuse Gloucestershire Children's Social Care and to the Police if a crime may have been committed.
- 1.2 Liaise with the head teacher about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- 1.3 Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.
- 1.4 Liaise with agencies providing early help services and coordinate referrals from the school to targeted early help services for children in need of support.

2 RECORD KEEPING

- 2.1 Keep written records of child protection and welfare concerns.
- 2.2 Maintain a chronology of significant incidents for each child with safeguarding concerns.
- 2.3 Ensure such records are kept confidentially and securely and separate.
- 2.5 When a child leaves our school, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an appropriately agreed manner. Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns the LA.

3 INTER-AGENCY WORKING AND INFORMATION SHARING

- 3.1 Cooperate with Children's Social Care for enquiries under section 47 of the Children Act 1989.
- 3.2 Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.
- 3.3 Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.

4 TRAINING

- 4.1 Undertake appropriate training, **updated every two years (with annual updates refresher training)**, in order to
 - be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced;
 - understand the assessment process for providing early help and intervention, e.g. the Gloucestershire Children Continuum of Need guidance and tools and the early help planning processes;
 - have a working knowledge of how the local authority conducts initial and review child protection case conferences and contribute effectively to these; and
 - be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers and young carers.

- 4.2 Ensure each member of staff has access to and understands the school's safeguarding and child protection policy and procedures, including providing induction on these matters to new staff members.
- 4.3 Organise whole-school child protection training for all staff members at least **every three years**. Ensure staff members who miss the training receive it by other means, e.g. by joining another school's training. Annual updates will also be provided through staff meetings and bulletins.
- 4.4 Link with Gloucestershire Safeguarding Children Partnership to identify appropriate training opportunities for relevant staff members.
- 4.5 Ensure the school allocates time and resources every year for relevant staff members to attend training.
- 4.6 Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.
- 4.7 Maintain accurate records of staff induction and training.

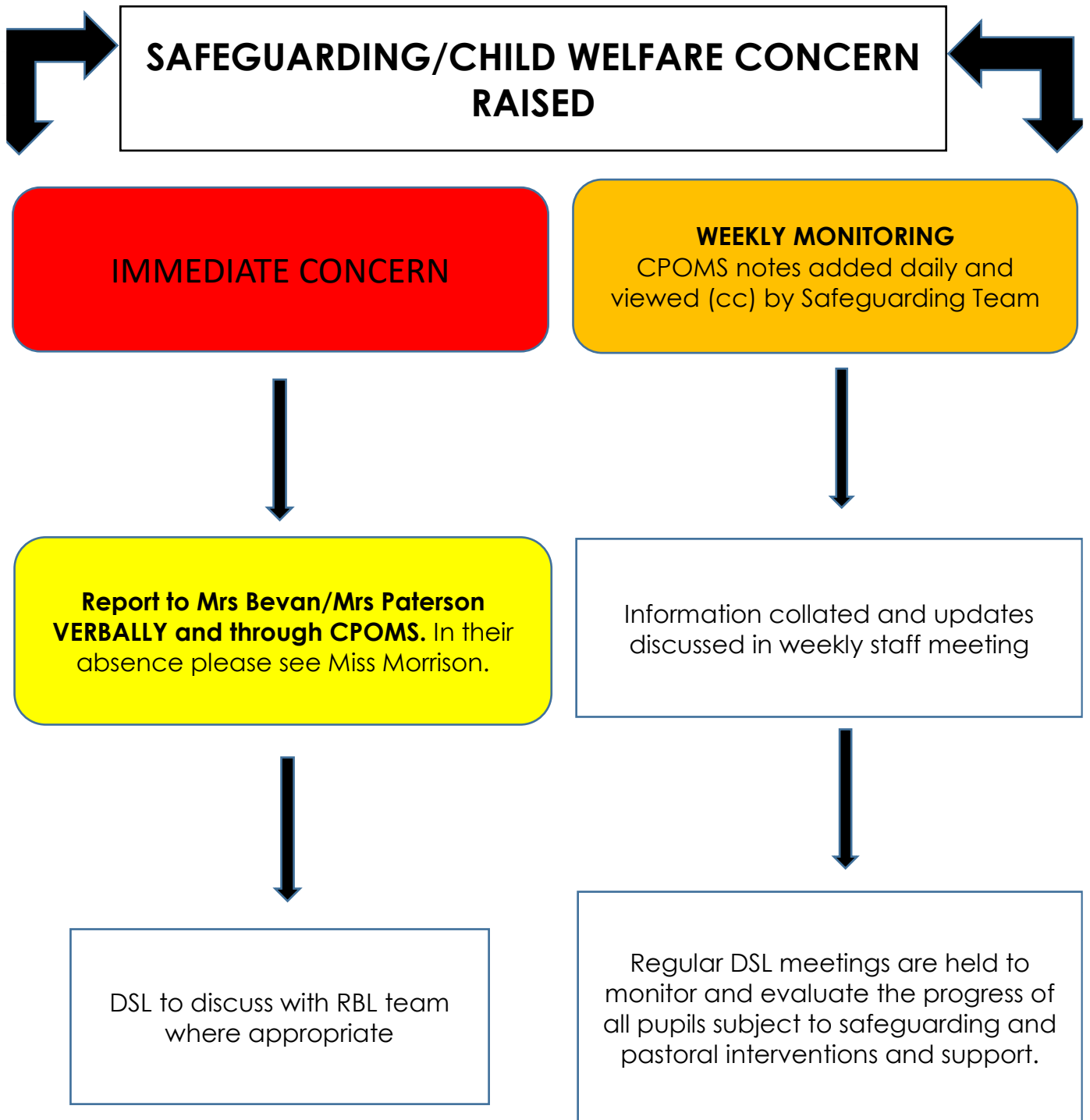
5 AWARENESS RAISING

- 5.1 Review the safeguarding and child protection policy and procedures annually and liaise with the school's governing body to update and implement them
- 5.2 Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the school in any investigations that ensue.
- 5.3 Provide an annual briefing to the school on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.

6 QUALITY ASSURANCE

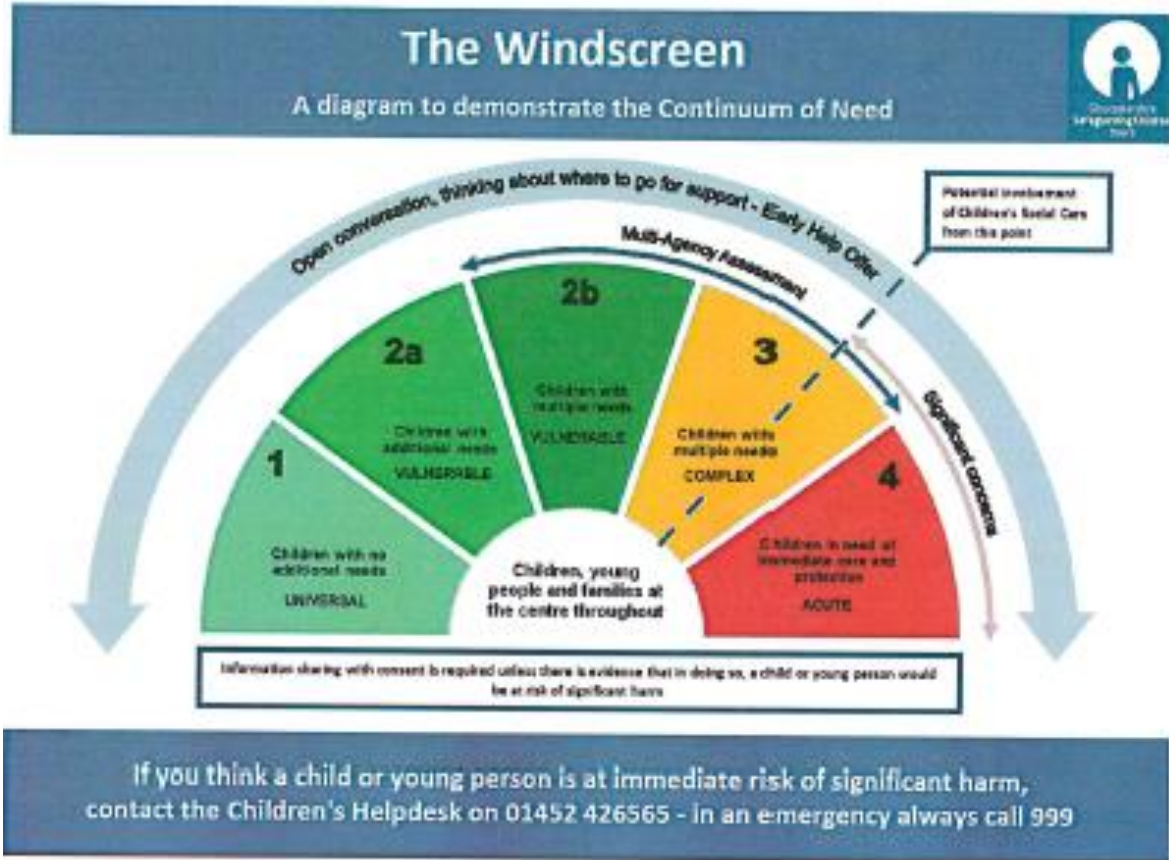
- 6.1 Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum once a year).
- 6.2 Complete an audit of the school's safeguarding arrangements at frequencies specified by the Gloucestershire Safeguarding Children Executive.
- 6.3 Provide regular reports, to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- 6.4 Take lead responsibility for remedying any deficiencies and weaknesses identified in child protection arrangements.

APPENDIX B: SAFEGUARDING PROCESS FLOW CHART FOR ST PAUL'S.



ANY INFORMATION ADDED TO CPOMS WHICH AFFECT WHOLE FAMILIES SHOULD BE LINKED TO ALL PUPIL RECORDS

APPENDIX C: THE GLOUCESTERSHIRE SAFEGUARDING CONTINUUM OF NEED



APPENDIX D: RESPONDING TO DISCLOSURES –GUIDANCE FOR STAFF

If a child wishes to confide in you the following guidelines should be adhered to:

- **Be honest**

- o Do not make promises that you cannot keep.
- o Explain that you are likely to have to tell other people in order to stop what is happening.

- **Create a safe environment**

- o Stay calm.
- o Reassure the child and stress that he/she is not to blame.
- o Tell the child that you know how difficult it must have been to confide in you.
- o Listen to the child and tell them that you believe them and are taking what is being said seriously.

- **Record on CPOMS exactly what the child has said to you and include:**

- o Child's name
- o Date and time of any incident
- o What the child said and what you said
- o Your observations e.g. child's behaviour and emotional state
- o Any action you took as a result of your concerns - specific information about who you spoke to, names, phone numbers and resulting actions.

- **Be clear about what the child says and what you say**

- o Do not interview the child and keep questions to a minimum.
- o Encourage the child to use his/her own words and do not try to lead them into giving particular answers.

- **Maintain confidentiality**

- o Only tell those people that it is necessary to inform such as Designated Safeguarding Lead (DSL); DDSL/ Additional DDSL and/or Chair of Governors.

- **Do not take sole responsibility**

- o Immediately consult your Designated Safeguarding Lead so that any appropriate action can be taken to protect the pupil if necessary.
- o The Designated Safeguarding Lead should refer these concerns to Social Care before the child goes home if still in school. A decision will be made by Social Care whether to convene a strategy meeting; undertake a social care or joint investigation or provide alternative services or advice.
- o Although referrals to Social Care would normally be made by the DSL, any other individual with concerns can make a referral.

NB: Social Care will advise about if and when to share information with parents if there are concerns that this may be putting the child more at risk.

If a child is in immediate danger you must contact 999.

APPENDIX E: ALLEGATIONS MANAGEMENT OF ABUSE MADE AGAINST OTHER CHILDREN 'CHILD-ON-CHILD ABUSE'

Staff should recognise that children are capable of abusing other children. Our child protection policy includes procedures to minimise the risk of child on child abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with.

This form of abuse should never be tolerated or passed off as "banter" or "part of growing up".

Expected action taken from all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of child on child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred to avoid a situation where child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of child on child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Gather the facts

Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who saw the incident? What was seen? What was heard? Did anyone try to stop it?)

If from the information that you gather you believe any young person to be at risk of significant harm you must make a safeguarding referral to social care immediately (where a crime has been committed the police should be involved also). If this is the case, once social care has been contacted and made a decision on what will happen next, you will be informed on your next steps.

For child on child abuse, and where it is deemed that a child is not at risk of serious harm, the child protection procedures should be followed and a referral made to the Front Door (Tel: 01452 426565) Option 1. The response given will vary according to the age of the young person and the particular characteristics of the situation.

Points to consider:

What is the age of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked if other issues arise (see following)

Where did the incident or incidents take place?

Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this particular area?

What was the explanation by all children involved of what occurred?

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying, for example, in which case regular and repetitive? Is the version of one young person different from another and why?

What is each of the children's own understanding of what occurred?

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Helpdesk.

Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has been harmed

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a trusted adult in school. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PSHE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases, support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through an early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that the young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the

investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence, such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

Preventative Strategies

At St Paul's we believe that it is important to develop appropriate strategies in order to prevent the issue of peer-on-peer abuse rather than manage the issues in a reactive way. Firstly, and most importantly is the recognition that child on child abuse can and will occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

This can be supported by ensuring that we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This will be strengthened through a strong and positive PHSE/SMSC curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment it is necessary to ensure that the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people, including use of inappropriate language and behaviour towards one another. In order to create such an environment, leaders recognise the importance of whole staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.

It is important that signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. ChildLine information is available to all young people.

Finally, it is important that pupils have a voice in our school. Our school council encourages all children to follow our 'expectations' of Kind, Safe, Best. By doing this, we feel that a positive ethos in school will be created and a culture where all children understand the boundaries of behaviour before it becomes abusive.

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

The approach adopted below is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

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

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

- > The incident involves an adult
- > 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 pupil in the images or videos is under 13
- > The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through our Schools Beat Officer or by calling 101.

Rebecca Gardiner Police Community Support Officer 9318 Neighbourhood Policing, Kingsway area Gloucestershire Constabulary Barton Street Police Station, 223 Barton Street, Gloucester, GL1 4HT Direct Line – 01452 753720 |

Recording incidents

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

The record-keeping arrangements set out in this policy also apply to recording these incidents.

Curriculum coverage

The curriculum draws from a number of sources according to the subjects and topics being taught. Throughout the curriculum, there is a strong focus on staying safe in all aspects of life, including on line. We do not teach specifically about sharing nudes or semi-nudes but explore the fundamentals of staying safe online and managing incidents of online bullying; maintaining anonymity online; the consequences of promoting inappropriate content and how to stop this behaviour.

The JIGSAW Curriculum (a mindful approach to PSHE), has been written to meet the needs of all children and young people in primary, secondary settings. Its aim is to support the development of the necessary skills and knowledge that our children need to lead a happy, safe, healthy life. Topics include advice on: • Relationship Abuse (including online) • Mental Health • Gender Identity & Sexuality • Equality and Anti-bullying (including online bullying) • Keeping myself safe / Protective behaviours • Celebrating Differences

The curriculum and policies develop an age appropriate awareness of being safe and maintaining health relationships with all, including peers.

Children learn how to manage relationships and respond to unwanted behaviours from both in face to face relationships and online.

For further information, please refer to our PSHE and RHSE curricula which can be found on our school website.

Partnership with other agencies

St Paul's Primary School joins with other agencies and charities to support our work with children. Year 6 have modules taught directly by the Police or other external sources on online safety. The school responds directly to concerns reported and Children's surveys and pupil voice are established means of adapting and developing the curriculum in response to identified need.

Reporting systems for our pupils

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

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

To achieve this, we will:

- > Put systems in place for pupils to confidently report abuse

- > Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- > Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- > All classrooms have a 'worry box' to enable confidential (or named) means of raising concerns
- > PHSE and classroom processes (such as class assembly times, visitors and day to day discussion) promote open, safe reporting processes
- > The pastoral team are proactive in working closely with children across the school
- > Termly assemblies run by the Headteacher focus on promoting children's safety, well-being and security when raising concerns of any kinds
- > Children's surveys and pupil voice are established means of adapting and developing the curriculum in response to identified need.
- > Following any reporting, children are reassured that they have made the right decision and supported closely by staff, including the pastoral team as appropriate.

APPENDIX F: ALLEGATIONS AGAINST STAFF (INCLUDING LOW-LEVEL CONCERNS) POLICY

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

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

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

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

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

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

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- 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
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

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

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

References

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

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