Child Protection and Safeguarding Policy

DRYBROOK PRIMARY SCHOOL

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Drybrook Primary School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing
of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

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The School's Safeguarding Team

- Thomas Henesey - Designated Safeguarding Lead (DSL)
- Claire Tuffley - Deputy Designated Safeguarding Lead (DDSL)
- Donna Hull - Deputy Designated Safeguarding Lead (DDSL)
- Jade Davies - Deputy Designated Safeguarding Lead (DDSL)
- Paula Harding - Deputy Designated Safeguarding Lead (DDSL)

Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

For the purposes of this policy, **"safeguarding and protecting the welfare of children"** is defined as:

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
    - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **"upskirting"** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, "making or sharing nudes or semi-nudes" means the creation, sending or posting of nude or semi-nude visual content by a person under 18. It includes photographs, videos and livestreams, whether self-generated, taken or created by another person, digitally altered or wholly generated using artificial intelligence. Every incident requires a safeguarding response, whether the sharing appears consensual or non-consensual.
"**Deep fakes**" and "**deep nudes**" refer to digitally manipulated and AI-generated nudes and semi-nudes.

The school uses the current KCSIE terminology "making or sharing nudes or semi-nudes". Where legislation or an external agency uses the term "indecent image", staff will understand that this includes photographs, videos, livestreams, pseudo-images and content digitally altered or generated using artificial intelligence.

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

Indecent images also include indecent **"pseudo-images"**, which are images have been created or manipulated using computer software and/or AI.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Legal framework

September 2026 statutory update

This policy has been reviewed against Keeping children safe in education 2026, effective from 1 September 2026, and Working Together to Safeguard Children 2026. Where this policy and later statutory guidance differ, the statutory guidance and Gloucestershire Safeguarding Children Partnership procedures take precedence pending the next formal review.

- All staff, including staff who do not work directly with children, must read Part one of KCSIE 2026 in full. The former condensed Annex A has been withdrawn; the DfE overview is a supplementary quick reference only.
- Support before statutory intervention is described as universal services and community-based early help, and the targeted early help level of Family Help. Staff must remain alert to need, record concerns and involve the DSL promptly.
- Safeguarding practice must recognise overlapping and simultaneous harms, including modern slavery, financial exploitation, teenage relationship abuse, stalking, child-to-parent or caregiver abuse, online harms, racism, misogyny and misandry.
- All making or sharing of nudes or semi-nudes, including AI-generated or digitally altered content, requires a safeguarding response. Staff must not view, copy, print, forward or save imagery unless specifically directed by police or children's social care.
- The school will maintain reliable DSL cover whenever the DSL is unavailable. The safeguarding inbox is monitored so concerns are received and acted on without delay; urgent concerns must also be raised directly with an available DSL or deputy.
- The SLT lead responsible for filtering and monitoring, supported by the DSL and IT support, will review effectiveness at least once each academic year across all internet-connected devices and relevant locations, recording checks and actions.
- Safeguarding records must distinguish observed fact, professional opinion and historic information. On transfer, the DSL will send the child protection file securely within five

days for an in-year move, or within the first five days of a new term, obtain confirmation of receipt, and include a clear structured summary of current concerns, relevant context and ongoing support.

- Following the 2026 change to regulated activity, the former volunteer supervision exemption no longer applies. Any volunteer teaching, training, instructing or supervising children on more than three days in a month or overnight is in regulated activity and must receive the checks required by KCSIE 2026.
- Data protection references include the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Data protection law does not prevent proportionate information sharing for safeguarding.
- The school will apply the updated KCSIE requirements for alternative provision, trainee teachers, supply staff, contractors, volunteers, sport, use of premises, reasonable force and restrictive intervention, children with medical conditions, young carers, mental health and SEND.

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

Data (Use and Access) Act 2025

Crime and Policing Act 2026 (including changes to regulated activity)

Children's Wellbeing and Schools Act 2026, where provisions are in force and applicable

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2026) 'Working Together to Safeguard Children 2026'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

- DfE (2026) 'Keeping children safe in education 2026' (in force from 1 September 2026)
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2025) 'Information sharing'
  The school shares safeguarding information with the 3 safeguarding partners (local authority, integrated care board, police) and other agencies where required, following the local protocol for assessment.
- DfE (2025) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2025) 'Recruit teachers from overseas'
- DfE (2025) 'Working together to improve school attendance'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2025) 'Virginity testing and hymenoplasty: multi-agency guidance'

This policy operates in conjunction with the following school policies and documents:
Artificial Intelligence Policy

- Children Missing from Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy
- Anti-bullying Policy
- Behaviour and Well-being Policy
- Online Safety Policy
- Cyber-security Policy
- Pupils' Personal Electronic Devices Policy
- Staff ICT and Electronic Devices Policy
- Data Protection Policy
- Photography and Images Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
  All allegations against staff will be referred to the Local Authority Designated Officer (LADO) in line with local procedures.
- Safer Recruitment Policy
- Staff Code of Conduct
- Low-level Safeguarding Concerns Policy

- Making or Sharing Nudes or Semi-nudes Policy
- Staff Disqualification Declaration Form

Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from Family Help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local Family Help process and understand their role in it. In Gloucestershire, this means following the Early Help pathway as set out by the local authority.
- Be aware of, and understand, the process for making referrals to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH), as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

Teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read Part one of KCSIE in full. NB: Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.

- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
  The school plays an important role in supporting the early identification of mental health issues and in working with external agencies to provide help and support for pupils at risk.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an Family Help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.

- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The headteacher has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. **NB:** Individual schools, working with the DSL, define what "available" means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
    - To Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) where abuse and neglect are suspected, and support staff who make referrals to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH).
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.

- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
    - Ensuring that the school knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.
    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

My Concern

The school uses MyConcern to store safeguarding files electronically. All staff have access to this and are able to raise concerns directly through the system. Any concerns are sent to all members of the safeguarding team to triage the concern and to decide on next steps. There is high challenge from staff at all levels and staff are encouraged to question all decisions that they do not agree with.

Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the Family Help process and by contributing to multi-agency plans to provide additional support. In Gloucestershire, this means following the Early Help pathway as set out by the local authority.

Where a need for Family Help is identified, the school will allow access for Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE.

The school will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.

- Learning from evidence and sharing perspectives to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging other's assumptions in a respectful manner.

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for Family Help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

The school recognises that poor attendance can be an indicator of safeguarding concerns and responds in line with DfE guidance, Working Together to Improve School Attendance (2025).

Family Help

Family Help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Any pupil may benefit from Family Help, but in particular, staff will be alert to the potential need for Family Help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan. Staff should be aware of additional barriers when recognising abuse and neglect of children with SEND or certain medical/physical health conditions, as outlined in KCSIE (2025, para 201). These can include assumptions that behaviour is related to the disability, or that indicators of abuse may be masked by underlying conditions.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.

- Have family members in custody or are affected by parental offending.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from Family Help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where Family Help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local Family Help process will be followed as required. In Gloucestershire, this means following the Early Help pathway as set out by the local authority.

Staff may be required to support other agencies and professionals in an Family Help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) for assessment for statutory services if the pupil's situation is not improving or is worsening.

Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the

appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Child-on-child abuse
There is a zero-tolerance approach to abuse — it should never be passed off as banter, 'just having a laugh', 'part of growing up' or 'boys being boys'. While it is recognised that girls are more likely to be victims and boys more likely to be perpetrators, all child-on-child abuse is unacceptable and will be taken seriously.

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both
inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.
All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a
child or young person.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from It.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

Online safety and personal electronic devices
Filtering and monitoring requirements also apply to the use of Artificial Intelligence (AI), in line with Keeping Children Safe in Education (2025).
Statutory Framework for the Early Years Foundation Stage (DfE, 2023)

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cyber-security Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils

being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for School.

Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff ICT and Electronic Devices Policy and Pupils' Personal Electronic Devices Policy.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography and Images Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved.
The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.
Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as "sexting" or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil,
and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around
how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and

when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.
Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

The school's full response to incidents of consensual and non-consensual sharing of indecent images and videos can be found in the Youth-produced Sexual Imagery Policy, including the appropriate reporting routes for both staff and pupils.

Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents.
Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as
possible when making referrals to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH).

Pupils potentially at greater risk of harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to
unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

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

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff

will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in
some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as
vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns
they have.

The pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Use of the school premises for non-school activities

Where the governing board hires or rents out school facilities or the school premises to organisations
or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a
lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

Work experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

Homestay exchange visits

School-arranged homestays in UK

Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will
consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

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

Privately arranged homestays

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

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school
becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow
the LA to conduct any necessary checks.

Concerns about pupils

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL
or deputy DSLs.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If Family Help is appropriate, the case will be kept under constant review. If the pupil's situation does
not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in the school's MyConcern system.

If a pupil is in immediate danger, a referral will be made to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) and/or the police immediately. If a
pupil has committed a crime, such as sexual violence, the police will be notified without delay. Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child
and family require in preventing needs escalating to a point where intervention would be needed. The school will consider whether a family group decision-making forum is appropriate to determine

the help and support the family network can provide for a pupil where concerns have been raised about their safety or wellbeing.

Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be
followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing
referrals. The DSL will provide staff members with clarity and support where needed. When making a
referral to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) or other external agencies, information will be shared in line with confidentiality
requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency
liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH). Where Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH)
decide that a statutory investigation is not appropriate, the school will consider referring the incident
again if it is believed that the pupil is at risk of harm. Where Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) decide that a statutory
investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Family Help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing

channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood
by, all staff. The school will ensure all allegations against staff, including those who are not employees
of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms
threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-level concerns will be handled in line with the schools' Low-level Safeguarding Concerns Policy. This includes allegations or concerns relating to supply teachers, volunteers, and contractors. Where incidents occur on school premises while external organisations are using facilities, the school will follow safeguarding procedures and inform the LADO.
All concerns, no matter how minor they may seem, must be reported and recorded, to ensure they are addressed within the culture of safeguarding at the school.
Communication and confidentiality

Communication and Confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

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

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be

disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

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

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

Safer recruitment

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

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

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the

child
workforce criteria.

The governing board will conduct the appropriate pre-employment checks for al prospective employees, including internal candidates and candidates who have lived or worked outside the UK. The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Single central record (SCR)

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

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

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that
all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included. The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a yearly basis and/or whenever there is a change in legislation. A safeguarding newsletter and update will be sent out termly by the trust and shared with all staff in school.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) in full.
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training which is updated at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing Family Help and statutory intervention, including local criteria for action and Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH).
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole-school approach to safeguarding and wider staff training and curriculum planning.

Staff members will be supported with their understanding of safeguarding issues and how to deal with them from their induction and throughout their time at the school. Staff members will be encouraged to participate in additional CPD alongside mandatory safeguarding training activities.

Monitoring and review

This policy is reviewed at least annually by the DSL and the headteacher. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is September 2027.

Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. Domestic abuse
2. Homelessness

3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Serious violence
16. Adult involvement in making or sharing nudes or semi-nudes

1. Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

2. Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

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

Referrals to the Local Housing Authority do not replace referrals to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) where a child is being
harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) will be made as

necessary where concerns are raised.

3. Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the
following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.

- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.
If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

4. Child abduction and community safety incidents

For the purposes of this policy, **"child abduction**" is defined as the unauthorised removal or retention
of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

5. Child criminal exploitation (CCE)

For the purposes of this policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

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

consider involving local services and providers who offer support to victims of county lines exploitation.

6. Cyber-crime

For the purposes of this policy, "**cyber-crime**" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures
where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber
Choices programme.

7. Child sexual exploitation (CSE)

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

8. Modern slavery

For the purposes of this policy, **"modern slavery**" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.
All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the
National Referral Mechanism.

9. FGM

For the purposes of this policy, **"FGM**" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM.
If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) and/or the police. The school's procedures relating to
managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH) as appropriate. NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the
pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

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

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

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

FGM is included in the definition of so-called "'honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

10. Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may
be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or

community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

11. Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to
enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to the country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to Children's Social Care (via the Multi-Agency Safeguarding Hub – MASH), the police or the Forced Marriage Unit. The DSL
or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced
marriage and the signs to look out for.

12. Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious

or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

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

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty". The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, which are outlined in the Prevent Duty Policy.

13. Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive
a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners'

Families where appropriate and allowed the opportunity to discuss questions and concerns.

14. Pupils required to give evidence in court

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

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

15.

The pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

Policy will be consulted and adhered to at all times.

16. Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

17. Adult involvement in making or sharing nudes or semi-nudes

The school's full response to making or sharing nudes or semi-nudes (YPSI) is outlined in the Youth-produced
Sexual Imagery Policy.

Sexually motivated incidents

The school will remain aware that not all instances of YPSI will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and
semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing of the nude or semi-nude images.

These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender shares unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents of YPSI involving adults may also be called “sextortion”, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

18. Safeguarding training criteria

Purpose

This appendix outlines the safeguarding training requirements for all staff members, governors, and volunteers to ensure compliance with statutory guidance and best practices in safeguarding children.

Core training requirements

The DSL and deputy DSLs will:

- Complete advanced safeguarding training every two years, which covers:

- Their specific roles and responsibilities.
- Multi-agency working.
- Identifying, understanding and responding to specific needs that can increase the vulnerability of pupils.
- Specific harms that can put pupils at risk.

- Undertake training that enables them to develop expertise so that they can support and advise staff and help them feel confident on welfare and safeguarding matters, particularly in relation to:
  - Ensuring that staff are supported during the referrals process.
  - Supporting staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Receive regular updates throughout the year to remain informed of any changes in legislation and best practices.
- Undertake Prevent awareness training.

All staff will:

- Complete safeguarding and child protection training at induction.
- Undertake refresher training annually, including updates on recognising signs of abuse, reporting procedures, and understanding the school's Child Protection and Safeguarding Policy, Behaviour Policy, Staff Code of Conduct and Safeguarding response to pupils who are absent from education.
- Read at least part one of KCSIE and ensure that they are aware of:
  - The local Family Help process and their role in it. In Gloucestershire, this means following the Early Help pathway as set out by the local authority.
  - The process for making referrals to LA children's social care and for statutory assessments.
  - The indicators of abuse, neglect and exploitation.
  - Safeguarding issues that can put pupils at risk of harm.
  - What to do if a pupil tells them they are being abused, exploited or neglected and how to manage confidentiality.
  - How to support victims of abuse, neglect and exploitation.

- Receive ongoing updates throughout the academic year via the trust newsletter and staff meetings, including updates to safeguarding guidance and legislation and changes to the school's safeguarding policies and procedures.

Members of the governing board will:

- Complete appropriate safeguarding and child protection training at induction which equips them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.
- Undertake updated safeguarding training relevant to their strategic role, including awareness of their responsibilities under KCSIE.
- Be trained on their obligations under the Human Rights Act 1998, the Equality Act 2010, and the local multi-agency safeguarding arrangements
- Receive enhanced training to effectively oversee the school's safeguarding arrangements if their role on the board has a specific safeguarding responsibility.

Specialist training
All staff members will receive awareness training on specific safeguarding issues and the school's procedures for dealing with them as outlined in Appendix A. Specialist training will be undertaken as outlined below:

- **Safer recruitment training:**
    - Will be required for all staff members involved with the recruitment and employment of staff to work with pupils, the substance of which covers part three of KCSIE at a minimum.
- **Online safety training:**
  Filtering and monitoring requirements also apply to the use of Artificial Intelligence (AI), in line with Keeping Children Safe in Education (2025). Statutory Framework for the Early Years Foundation Stage (DfE, 2023)
    - It is mandatory for all staff and governors to understand the risks associated with online activity and how to educate pupils about online safety.
    - Online safety training will include, amongst other aspects, understanding the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
      Filtering and monitoring requirements also apply to the use of Artificial Intelligence (AI), in line with Keeping Children Safe in Education (2025). Statutory Framework for the Early Years Foundation Stage (DfE, 2023)
- **Prevent duty training:**

- All staff will be trained to understand their role in preventing radicalisation and extremism and how to maintain due regard to the need to prevent people from becoming terrorists or supporting terrorists.

- Staff will receive specialist training on recognising and addressing child-on-child abuse, including bullying, sexual violence, and harassment.

Training Delivery

- In line with any advice from local safeguarding partners, all staff members will receive safeguarding training during their induction and will be supported to understand the school's policies and procedures in relation to dealing with safeguarding concerns.
- Training will be delivered with due regard to the Teachers' Standards.
- Training will be delivered through a combination of face-to-face sessions, online modules, and external courses accredited by recognised safeguarding bodies.
- Records of all training, including dates, content, and attendees, will be maintained securely.

Reviewing training

- The DSL will be responsible for ensuring that all staff receive appropriate training and that records are up-to-date.
- The effectiveness of safeguarding training will be reviewed annually as part of the school's safeguarding audit.

Compliance

All staff will be required to confirm that they have read and understood Part One of KCSIE and any other safeguarding guidance relevant to their role. Failure to complete mandatory training may result in disciplinary action.

This appendix will be reviewed annually to ensure that it aligns with current legislation and best practices in safeguarding children.

Safeguarding in the Early Years Foundation Stage (EYFS)

Drybrook Primary School recognises the specific safeguarding responsibilities for children in the Early Years Foundation Stage (EYFS), in line with the statutory EYFS Framework. In addition to the whole-school procedures set out in this policy, the following arrangements apply in EYFS:

• Staff ratios and supervision – The school ensures staffing ratios meet or exceed statutory requirements at all times. Children are supervised appropriately, including during toileting, outdoor play, and transitions.

• Designated Safeguarding Lead cover – A DSL or Deputy DSL is always available to EYFS staff during opening hours.

• Use of mobile phones and cameras – Personal mobile phones and cameras must not be used in EYFS settings. Photographs of children are taken only on school devices and stored securely.
• Intimate care – Where intimate care is required, this is carried out sensitively and in line with the school's Intimate Care Policy. Staff undertaking intimate care receive appropriate training.
• Safe collection – EYFS staff follow robust procedures for the safe collection of children, including verification of authorised adults.
• Disqualification by association – All staff and volunteers working in EYFS, or later years provision for under-8s, are required to complete a Disqualification Declaration Form.
• Safer recruitment – At least one member of every recruitment panel has up-to-date safer recruitment training, and additional checks are completed for all adults working with children under 8, in line with childcare legislation.

• Training – EYFS staff receive safeguarding and child protection training in line with this policy and the EYFS Statutory Framework.
• Vulnerabilities of younger children – The school recognises that very young children may be unable to recognise or articulate concerns, and so staff are trained to be alert to changes in behaviour, presentation, or development that may indicate abuse or neglect.