



Holmer Green Senior School

Safeguarding Policy
(including Child Protection
allegations against staff and
low-level concerns)

February 2024

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead KS5 and 4 (DSL)	Kerri Stone	stonek@holmer.org.uk
Designated safeguarding lead KS3 (DSL)	Dayle McGilvray	mcgilvrayd@holmer.org.uk 01494 712219
Deputy DSL	Sarah Lary	Larys@holmer.org.uk 01494 712219
Local authority designated officer (LADO)	LADO	secure- LADO@buckinghamshire.gov.uk 01296 382070
Safeguarding Governor	Steve Pilgrim	stevep@holmer.org.uk
Channel helpline		020 7340 7264
First Response		01296 383962

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

- This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).
- This policy is also based on the following legislation:
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques

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

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- Buckinghamshire Council
- Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
- The chief officer of police for Thames Valley Police

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

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

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carers has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

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

- Behaviour Policy
- Pastoral Support System
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

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

- All staff will be aware of:
- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff, the behaviour policy, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, online safety policy: which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring,] and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our Key Stage 4/5 DSL is Kerri Stone, Assistant Headteacher and Key Stage 3 DSL is Dayle McGilvray, Assistant Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can also be contacted out of school hours if necessary, via email at stonek@holmer.org.uk or mcgilvrayd@holmer.org.uk

When the DSL is absent, the deputy – Sarah Lary, Deputy Headteacher – will act as cover.

If the DSL and deputy are not available, Ed Hillyard, Headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

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

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

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead or, link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

› Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- › Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

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

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

- › Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

6. Confidentiality

The DfE issued guidance on 'Information Sharing July 2018'. This refers to the seven golden rules of information sharing (also see appendix 9):

The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

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

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

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

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

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

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

A *safeguarding partner* in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:

- a. The local authority;
- b. A clinical commissioning group for an area any part of which falls within the local authority area;
- c. The chief officer of police for an area any part of which falls within the local authority area.

[71] Children Act 2004, Section 16E.

The following link allows anyone to make an online referral.

7.2 If a child makes a disclosure to you

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

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

Bear in mind that some children may:

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

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

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow the safeguarding procedures.

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

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

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

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

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

Early help assessment

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

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

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

Referral

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

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

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

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

7.5 If you have concerns about extremism

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

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

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

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

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

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

7.6 If you have a concern about mental health

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

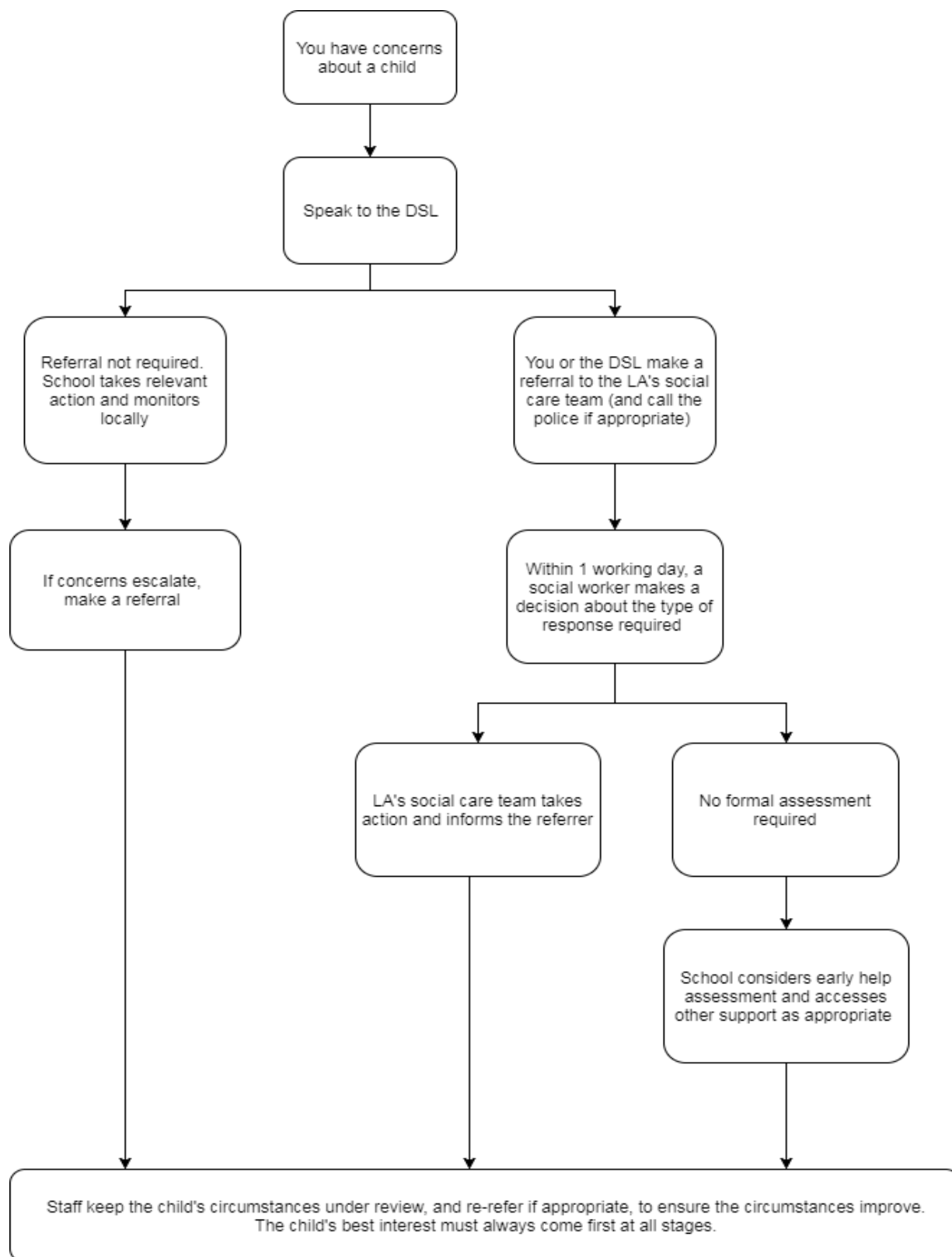
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Reference the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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

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



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

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

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

All schools:

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

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

7.8 Allegations of abuse made against other pupils

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

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

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

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

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

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

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

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

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

7.9 Sharing of nudes and semi-nudes ('sexting') – See Appendix 5

Suggested approach based on [guidance from the UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

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

You must **not**:

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

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

Initial review meeting

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

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

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

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police:

For an immediate concern, call 999 or to log an incident, either call 101 or log online.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education – PSHCE lessons. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse through a member of the pastoral team
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils – through their PSHCE lessons

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback 8. Online safety and the use of mobile technology

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

To address this, our school aims to:

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

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

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

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. See our [ICT Acceptable Use Policy](#).
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website [ICT Acceptable Use Policy](#); [Information IT and Cyber Security Policy](#); [Mobile Phone Policy](#).

8.1 Artificial intelligence (AI)

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

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

Holmer Green Senior School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

9. Notifying parents or carers

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

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

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

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

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

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

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

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. Pupils with a social worker

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

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

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

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

12. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, Assistant Headteacher, Alan Wooller, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

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

13. Children and the Court system

- There are a growing number of children who have to give evidence as witnesses in a crown, magistrate or youth court and this can have a significant impact on their family relationships, education, behaviour and general well-being. We have a pastoral team that can support such children and have experience in doing so. Child witnesses often feel they have some form of guilt as they are being asked to go to court and are often unaware how common it is for children to be witnesses. The following link gives some guidance for 12-17 year olds about being a child witness. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708093/ywp-12-17-eng.pdf

Children with family members in prison

- There are a growing number of children who have family members in prison as a result of continued rise in prison populations. Such an event can be traumatic for the child and can often leave them with vulnerable care arrangements and no one looking out for them. Further, communication between the Courts/Police/Social services and the school may not be joined up due to the privacy surrounding cases. The following link gives some guidance to any of our students who find themselves in this position. <https://www.nicco.org.uk/userfiles/downloads/5ad4850cb565e-action-for-prisoners-families-young-peoples-booklet.pdf> The following link may also be useful for those in school supporting any of our students experiencing this: <https://www.nicco.org.uk/>

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Whistle-blowing

The whistle-blowing policy can be found [here](#)

15. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

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

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

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

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

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

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

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

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

This training will be regularly updated and will:

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

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

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and Deputy

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

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

They will also undertake Prevent awareness training.

16.3 Governors

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed **annually** by Kerri Stone, Assistant Headteacher. At every review, it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- › [Behaviour](#)
- › Staff code of conduct
- › [Complaints](#)
- › [Health and safety](#)
- › [Attendance](#)
- › [Mobile Phone Policy](#)
- › [Equality](#)
- › [Relationships and sex education](#)
- › [Curriculum](#)
- › [Designated teacher for looked-after and previously looked-after children](#)
- › [Privacy notices](#)
- › Recruitment Policy (including Safer Recruitment)
- › [Whistleblowing](#)
- › [ICT Acceptable Use Policy](#)

Policy Agreed by Governors: February 2024

To be reviewed: February 2025

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

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

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

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

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

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

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

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:

- Suspicion
- Complaint

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

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

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

Record keeping

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

Records will be:

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

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

References

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

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

Appendix 3: specific safeguarding issues

Children who are absent from education

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

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

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

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

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

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

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late

- Regularly missing school or education
- Not taking part in education

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

Homelessness

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

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

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

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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](https://www.gov.uk/government/collections/educate-against-hate) and charity [NSPCC](https://www.nspcc.org.uk) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

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

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

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

Serious violence

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

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

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

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

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

Checking the identity and suitability of visitors

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

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

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

Non-collection of children

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

Attempt to contact the named adults who have responsibility for the child.

Notify the DSL or Deputy.

Missing pupils

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

Contact the DSL.

Contact the named adults who have responsibility for the child.

If appropriate notify the police of the missing child.

Skin betting

Skin betting is a growing problem where children win virtual items, like online weapons in games (the item is known as a 'skin') which can then be sold for real money. It is estimated that 370,000 children between the ages of 11-16 on a weekly basis, spend their own money on purchasing such items. This can obviously lead to significant debt and leads to further vulnerability, e.g. from gangs.

Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated Safeguarding lead when they become aware of private fostering arrangements. The designated Safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams)
- teenagers estranged from their families

Appendix 4: Sharing nudes and sexting

Sharing nudes and semi-nudes (previously known as 'sexting')

The Definition of Sexting

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting' as defined by police guidance and therefore the school has defined sexting as:

- the sharing of sexual imagery by young people;
- creating and sharing sexual photos and videos.

How the School will handle an incident

All incidents involving youth produced sexual imagery will be responded to in line with the school's Safeguarding and Safeguarding (Child Protection) Policy.

When an incident involving youth produced sexual imagery comes to the school's attention, the incident should be referred to the DSL as soon as possible.

The DSL should hold an initial review meeting with appropriate school staff and there should be subsequent interviews with the young people involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a teacher, the DSL in school, or any member of the school or college staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school, or inform the police directly.

All members of staff (including non-teaching) are made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This is covered within staff training.

Any direct disclosure by a young person is taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

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

An immediate referral to police and/or children's social care will be made if at this initial stage:

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

If none of the above apply, then the school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

The decision will be made by the DSL with input from the Headteacher and input from other members of staff if appropriate. The decision will be recorded in line with school Policy.

The decision will be made in line with the school's Safeguarding/Child Protection procedures and will be based on consideration of the best interests of the young people involved. This will take into account proportionality as well as the welfare and protection

of the young people. The decision will be reviewed throughout the process of responding to the incident.

How the School will Assess the Risk

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

Informing parents (or carers)

Parents (or carers) will be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents will generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the young people to inform their parents themselves.

Reporting incidents to the police

If it is necessary to refer to the police, contact will be made through existing arrangements. This may be by dialling 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) may be confiscated and the police will be called. The device will be turned off and placed under lock and key until the police are able to come and retrieve it.

Children's social care contact and referrals

If the DSL is aware that children's social care are currently involved with a young person involved in an incident of youth produced sexual imagery then they will contact children's social care. They will also contact children's social care if they believe they may be involved, or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for children's social care involvement, then they should make a referral in line with their Safeguarding/Child Protection procedures.

DSLs will ensure that they are aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support schools in responding to youth produced sexual imagery.

Holmer Green Senior School make the initial referral to the First Response team.

Searching devices, viewing and deleting imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the Safeguarding (Child Protection) Policy and procedures of the school or college. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil. A "good reason" to examine or erase the data on an electronic device would be that the DSL reasonably suspects that the data or file in question has been/could be used to commit an offence, cause harm, to disrupt teaching, or break the school rules.

If a decision is made to view imagery the DSL needs to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL will:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.
- Ensure viewing is undertaken by the DSL or another member of the Safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's Safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording Safeguarding incidents.
- If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems) then DSLs should ensure that the staff member is provided with appropriate support. Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery. If, however, the material on the device is suspected to be evidence relevant to an offence, it should not be deleted prior to giving to the police.

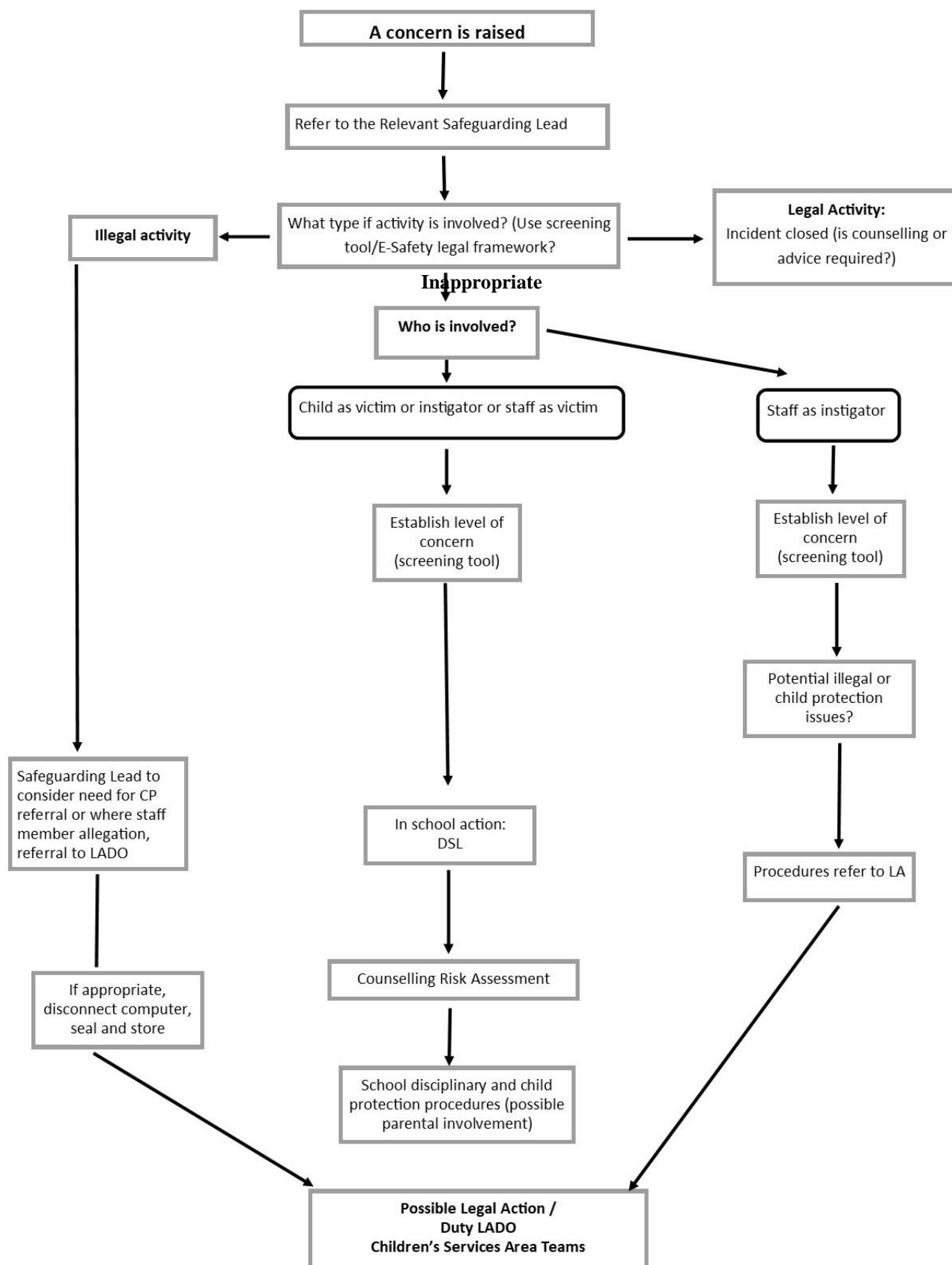
The Searching, Screening and Confiscation advice highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery.

Further Guidance

The school will adhere to additional guidance set out in:

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)

Appendix 5: What to do if you have an E-safety concern



Screening Tool

This screening tool can be used to assist decision making in dealing with incidents of computer or e-communications misuse within school. It can be used to inform initial action but is not a substitute for a thorough risk assessment / investigation.

This should be used alongside the e-Safety flow chart and incidents of misuse matrix.

If you are concerned that a child may have been a victim of a criminal offence or suffered child abuse, please contact a member of the Children's Safeguard Service.

Type of incident

- | | |
|------------|--------------------------|
| Sexual | <input type="checkbox"/> |
| Bullying | <input type="checkbox"/> |
| Violence | <input type="checkbox"/> |
| Incitement | <input type="checkbox"/> |
| Financial | <input type="checkbox"/> |
| Grooming | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |

How was the incident discovered?

- | | |
|--|--------------------------|
| Self reported | <input type="checkbox"/> |
| Reported by 3 rd party (friends or parents) | <input type="checkbox"/> |
| Reported by Teacher | <input type="checkbox"/> |
| Other (e.g. Police or Internet Watch foundation) | <input type="checkbox"/> |

What was their response to the incident?

- | | |
|-------------|--------------------------|
| Unconcerned | <input type="checkbox"/> |
| Curious | <input type="checkbox"/> |
| Distressed | <input type="checkbox"/> |
| Frightened | <input type="checkbox"/> |
| Secretive | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |

What did the incident refer to?

Answer the key questions relating to the particular incident

Child as Victim:

Content

1. What was the type of content? (Sexual, violence, racial, other)
2. Did anyone else see it?
3. Have they told anyone else about it?

Publishing

1. Is the child identifiable?
2. Can their location be traced/
3. Is text or image potentially indecent or illegal?

Bullying

1. What was the type of bullying? (sexual, violent, physical, group)
2. Were information or images published of the child?
(If yes, refer back to publishing section for more questions to ask)

Predation / Grooming

1. Assess the extent of the contact :
 - One off conversation
 - Regular conversation
 - Regular conversation using inappropriate or sexualised language or threats
 - Attempts to breakaway
 - Offline meeting arranged
 - Offline meeting occurred
(Consider if an offence has occurred)
2. Are the parents aware?
3. When did the incident occur?

Request for information

1. Did the child give out any personal information?

Child as Instigator:

Content

Refer to 'Child as Victim' questions on content

Refer to AIM project matrix to assess the child's response to the content

Incitement

1. Was the child secretive about the site?
2. Did the child access the site in an isolated place?
3. Did they understand the risks of accessing this site?
4. Was their response to the site?
 - Healthy (e.g. using for research)
 - Problematic (looking for advice or guidance)
 - Harmful (relying on site for tips, using site to communicate with likeminded individuals, the site is reinforcing /minimising potentially harmful behaviours e.g. self-harm, pro anorexia sites)

Send/Publishing

1. Has an offence taken place?
(Refer to glossary for information on what constitutes an offence)
2. Were others put at risk e.g. their image / information was sent / published
3. Was this an isolated incident or persistent?
4. Did the instigator have empathy for the victim?

Interception of communications / Hacking

1. Have they placed themselves or others at risk?
2. Has personal or financial information been stolen?
(If yes, this constitutes a criminal offence and advice should be sought from the police)
3. Has illegal content been accessed and sent to other's computers?

Once you have gathered the appropriate information, assess the effect of the incident on the child and identify how the child can be best supported. This may be either in school (using existing policies and resources to support children) or in certain circumstances with external help.

Staff misuse

Did the member of staff misuse the school's internal email system?

Did the member of staff communicate with a young person inappropriately e.g. via text message, multimedia images.

Consider the extent of the communication

- One off conversation
- Regular conversation
- Regular conversation using inappropriate or sexualised language or threats
- Attempts to breakaway
- Offline meeting arranged
- Offline meeting occurred

Did the member of staff access inappropriate/ illegal material within school?







Did the member of staff access inappropriate/ illegal material using school equipment?

Did the member of staff access inappropriate/ illegal material using their own equipment?

If you are concerned that a child may have been a victim of a criminal offence or suffered child abuse, please contact the child protection officer before taking any other action.

Appendix 6: Safeguarding/Child Protection procedures

Holmer Green Senior School - Safeguarding/Child Protection Procedures:

<p>You are concerned about a student OR a student makes a disclosure to you.</p>  <p>Make sure the student is in a safe place.</p>  <p>Tell Designated Safeguarding Lead or deputy DSL immediately.</p>  <p>As soon as possible complete CPOMS referral.</p>	<p>You are concerned as a result of a disclosure about a member of staff at Holmer Green Senior School.</p>  <p>Make sure the student is in a safe place if relevant – for example take to a HUB.</p>  <p>Tell the Headteacher immediately. Do not discuss details with others in the school (staff, students, or parents)</p>  <p>If the Headteacher is absent, inform the Deputy Head or most senior member of school staff who is deputising.</p>
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Appendix 7: Safeguarding expression of concern

Safe Guarding Procedures Expression of Concern Record

Use this form to make a record of the concern you have and pass this to the Designated Safeguarding Lead as soon as possible on the day on which your concern arose.

Staff Name:

Date:

Student/s of Concern:

Tutor

Group: Situation during which your concern arose:

Please describe as accurately as possible what was said / overheard which causes you to be concerned about this student:

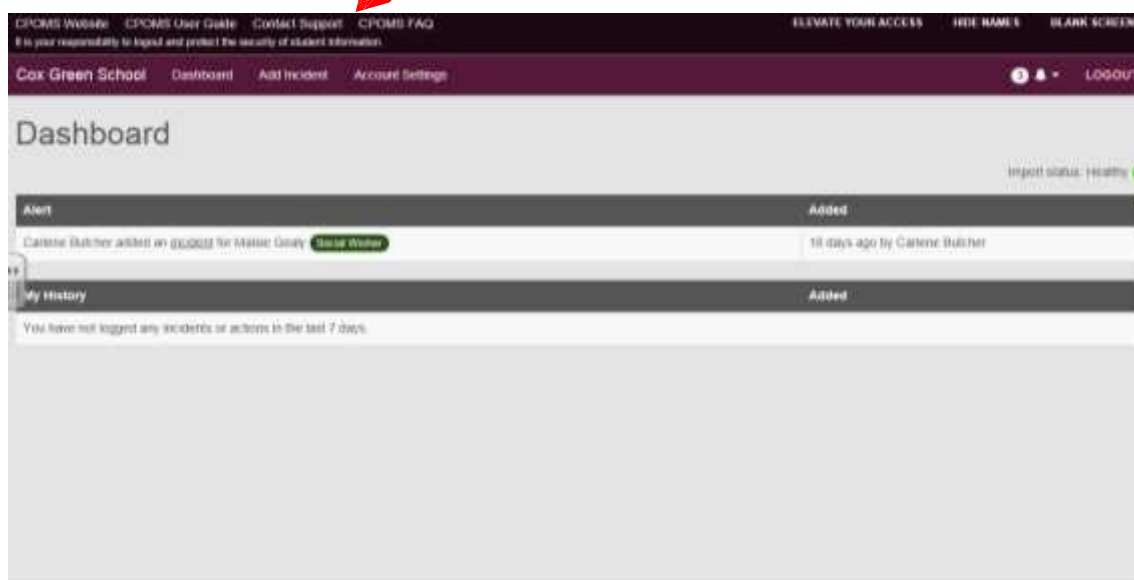
Please note the action you have taken as a result of your concern (include any discussions you have had and actions taken)

Appendix 8: Logging an incident on CPOMS

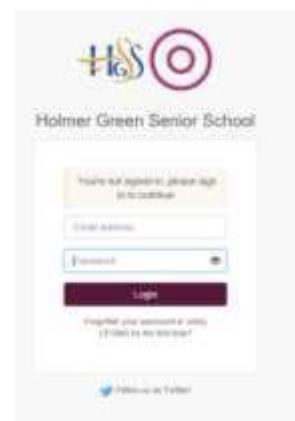
Click on the shortcut key on the desktop

Login and you will see the screen below.

To add an incident, click on "Add incident" in the purple banner.

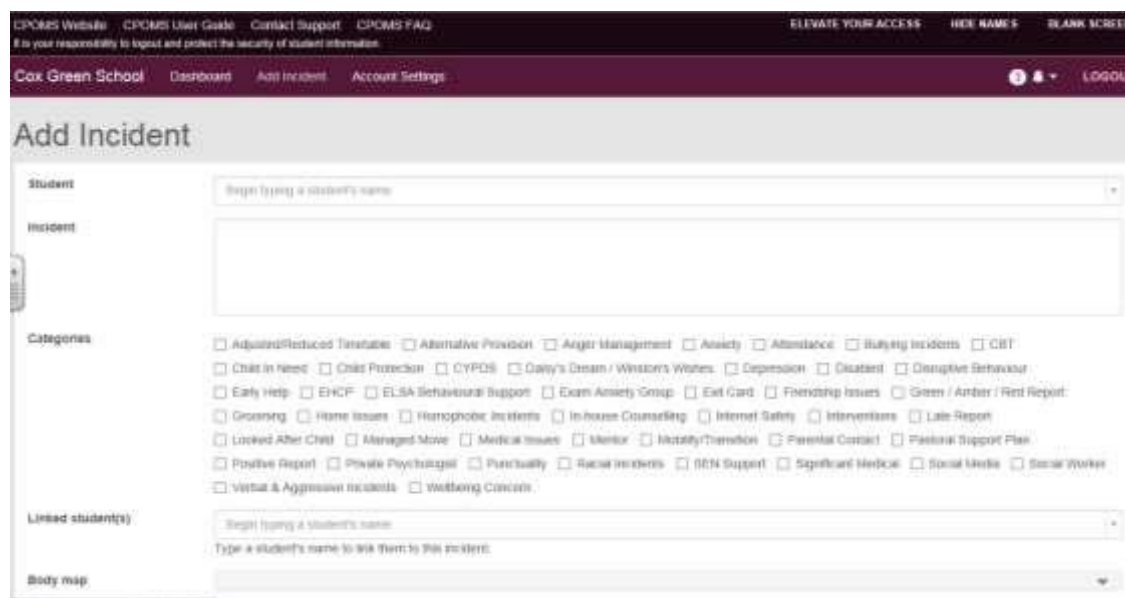


The screenshot shows the CPOMS Dashboard for Cox Green School. The top navigation bar is purple and contains links for CPOMS Website, CPOMS User Guide, Contact Support, CPOMS FAQ, Elevate Your Access, Hide Names, Blank Screen, Cox Green School, Dashboard, Add Incident, Account Settings, and a Logout button. The main content area is titled 'Dashboard' and shows an 'Alert' section with a message about a student's absence. Below this is a 'My History' section. A red arrow points to the 'Add Incident' link in the top navigation bar.



The screen

below appears.



The screenshot shows the 'Add Incident' form in CPOMS. The form has a purple header with the same navigation links as the dashboard. The main content area is titled 'Add Incident' and contains several sections: 'Student' (a dropdown menu), 'Incident' (a large text area), 'Categories' (a list of checkboxes for various incident types), 'Linked student(s)' (a dropdown menu), and 'Body map' (a dropdown menu). The 'Categories' section includes checkboxes for Adjusted/Reduced Timetable, Alternative Provision, Anger Management, Anxiety, Attendance, Bullying Incidents, CBT, Child in Need, Child Protection, CYPDS, Daily's Dream / Winston's Wishes, Depression, Disabled, Disruptive Behaviour, Early Help, EHCP, ELSA Behavioural Support, Exam Anxiety Group, Exit Card, Friendship Issues, Green / Amber / Red Report, Groaning, Home Issues, Homophobic Incidents, In-house Counselling, Internet Safety, Interventions, Late Report, Locked After Care, Managed Move, Medical Issues, Mentor, Mobility/Transition, Parental Contact, Pastoral Support Plan, Positive Report, Private Psychological, Punctuality, Racial Incidents, RSN Support, Significant Medical, Social Media, Social Worker, Verbal & Aggression Incidents, and Wellbeing Concerns.

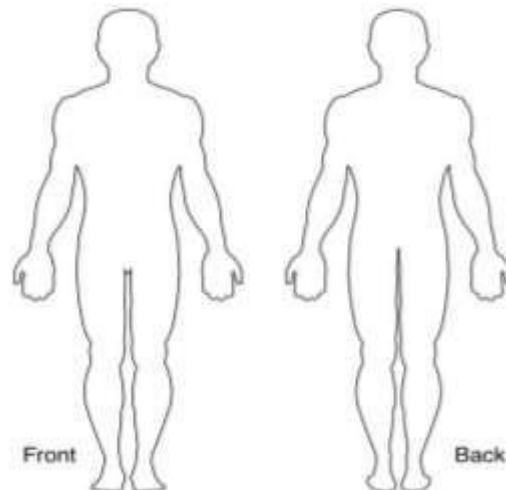
Start typing the student's name. Select the student needed.

In the "incident" box record any factual information about the incident.

In the "Categories" label the relevant box (you must select one label but can select more than one).

If the incident involved other students their names can be added in the "Linked student(s)" box.

If the incident involved an injury to the body, e.g. self-harming, abuse, or fight, then click on the body map, click on the relevant part(s) of the body.



Add a date and time the incident took place. If you wish files can be uploaded.

Then click "add incident".

A screenshot of a web application interface for 'Cox Green School'. The page is titled 'Add Incident' and has a sidebar with links to 'Dashboard', 'Add Incident', and 'Account Settings'. The main form contains several sections: 'Categories' with checkboxes for 'Positive Report', 'Private Psychological', 'Pulsuality', 'Racial Incidents', 'SEN Support', 'Significant Medical', 'Social Media', 'Social Worker', 'Verbal & Aggressive Incidents', and 'Wellbeing Concern'; 'Linked student(s)' with a search bar; 'Body map' with a dropdown menu; 'Date/Time' with a date picker set to 'Sat 14 October 2017' and a time input set to '9:58 PM'; 'Alert Staff Members' with a search bar and a note about highlighting colleagues; 'Files' with a large text area and a 'Click to browse or drag a file to upload' button; and 'Agency Involved' with a 'Select Agency' dropdown and an 'Add Incident' button. A red arrow points to the 'Add Incident' button.

Once completed you can log out.

Appendix 9: Confidentiality and Information sharing

Confidentiality and Information Sharing Guidance from Safeguarding Board

All information obtained by school staff about a student and their family is confidential and will be shared with other professionals and agencies once the family have been informed.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 or over are able to give their own consent

Where a child is at risk of suffering significant harm, schools have a legal duty to share this information with Children's Social Services and make appropriate referrals. Equally, where a child is subject to a Safeguarding/Child Protection investigation, schools must share any information about the child requested by Children's Social Services.

Parental consent to making a Safeguarding/Child Protection referral should be sought but if withheld, the referral must still be made, and parents just made aware of this.

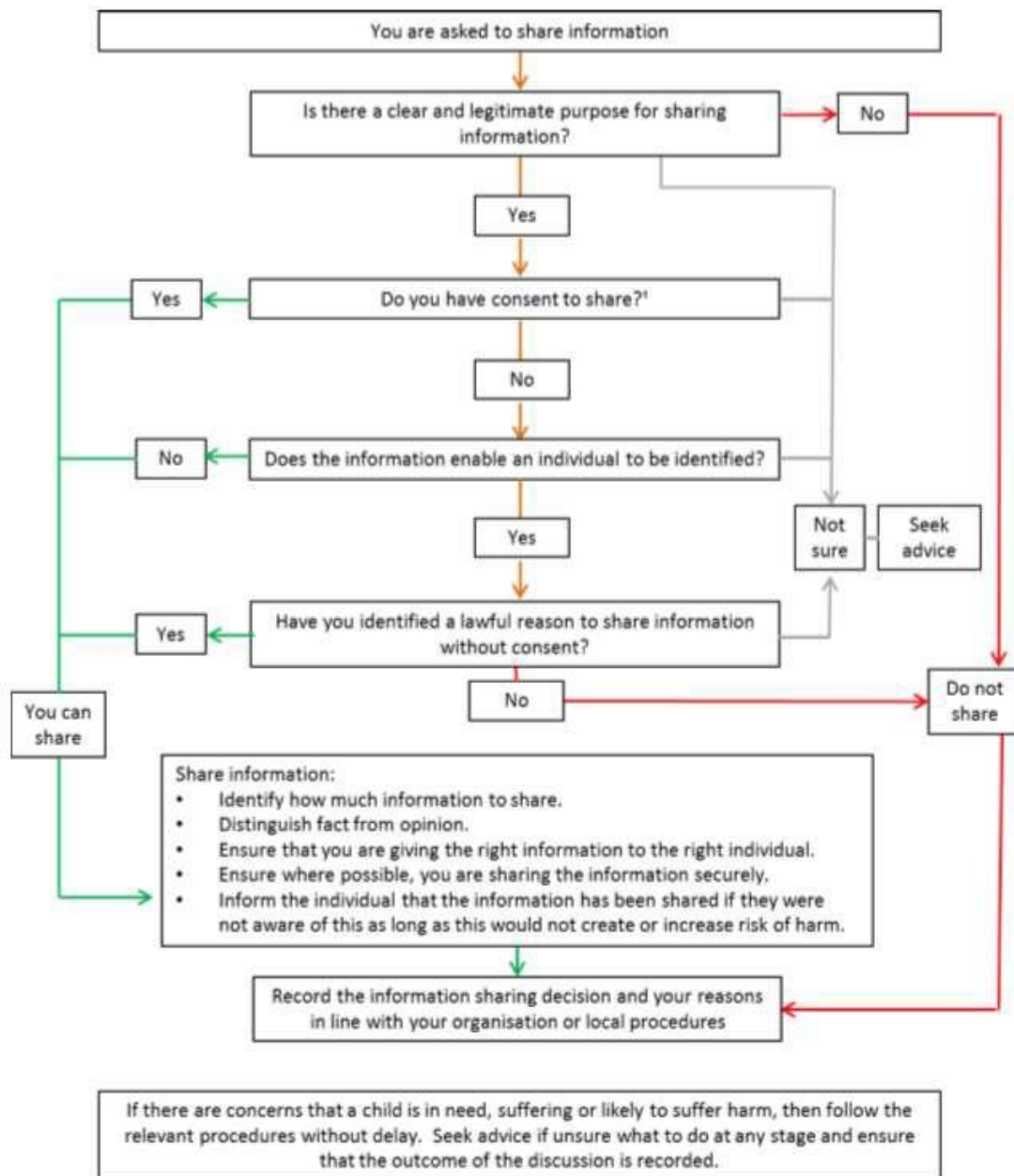
Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose.

In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated Safeguarding lead or a member of the Senior Leadership Team.

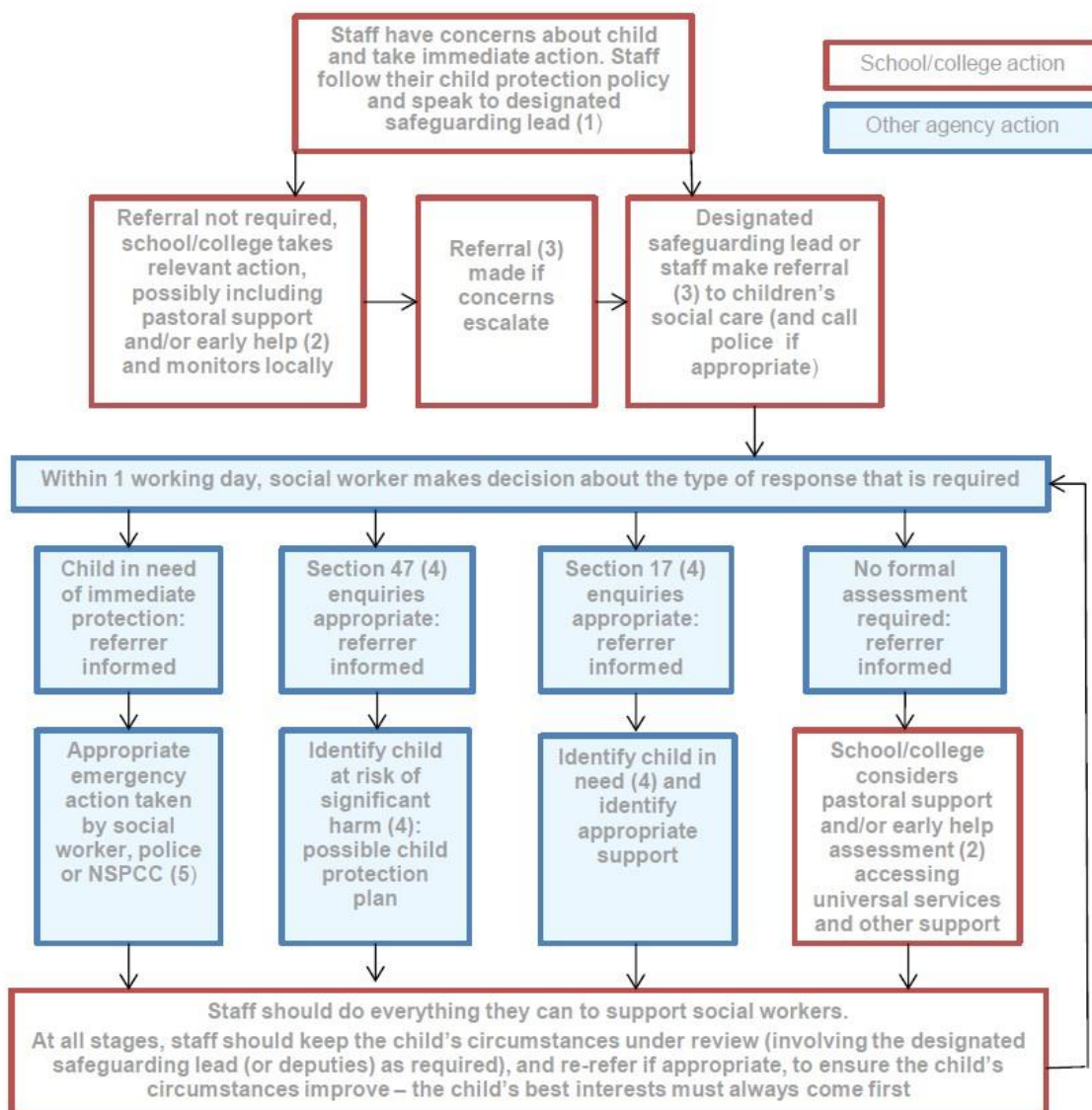
Appendix 10: Flow chart of how to share information

Flowchart of when and how to share information (Dfe Information Sharing July 2018)



Appendix 11: Flowchart for concerns about a child

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix 12: Alternative Provision evaluation

	Answers
Name of Holmer Green Senior School member of staff carrying out the evaluation	
Date of evaluation	
Name of alternative provider (circle)	Aspire Orchard House Other: _____
Is the alternative provider registered as an independent school? (it must be if caters full-time for 5 or more pupils of compulsory school age, or 1 pupil who is looked after or has an EHCP) (NB: Typically, unregistered providers will be visited by inspectors)	
Name of key contact at alternative provision (make this person aware that if the school is called for a section 5 inspection, then we will let them know as they could be spoken to by the Ofsted inspectors)	
Contact's address	
Contact's Email address	
Contact's telephone Number	
Confirm written confirmation on headed paper has been obtained from the alternative provider that appropriate Safeguarding checks have taken place on individuals working in the establishment? (This should be scanned and stored electronically by the DSL, SLT member overseeing the SCR). An updated copy should be sort each academic year.	

The below areas need to be tracked rigorously and as frequently as they are at Holmer Green Senior School, e.g. attendance on a daily basis and progress on a half-termly basis.

Academic year: _____						
	Term 1	Term 2	Term 3	Term 4	Term 5	Term 6
Attendance of pupil %						
Behaviour of pupil 1-4 <i>(1 – Outstanding 2 – Good 3 – Requires Improvement 4 – Serious Concern)</i>						
Progress/Achievement of pupil						
Add name of _____						
qualification and level						
(BTEC, GCSE, Entry level, etc.)						
1-9L/M/H; Tr6+; tr6;						
Tr6-; Tr5+; Tr5; Tr5-;						
U; N/A; Absent						
Pupil voice (discuss pupil views on their progress) include any work samples the pupil is particularly proud of/indicates quality of provision						
Pupil voice on their safety and welfare in alternative provision						

Name(s) of pupils at the provider	
HGSS member of staff responsible for monitoring attendance	Attendance officer
HGSS member of staff responsible for monitoring behaviour and learning	

Appendix 13: Attendance Procedures

Attendance Procedures

We aim to keep students safe by having clear knowledge of where Holmer Green Senior School Students are at all times.

After AM registration, the attendance office will:

1. Ensure all AM registers are entered into SIMS/Satchel either electronically or manually.
2. Run the Emergency Fire Register report and place in the Red Fire Evacuation Folder in the medical room. (Focus, Lesson Monitor, Whole Group Student Reports, Todays Register Report, OK). Staple the daily attendance report in year groups for easier hand out in case of emergency.
3. Listen to phone messages, check the attendance emails then update SIMS with correct attendance code and reason in comment, and where known, minutes late. (Focus, Lesson Monitor, Edit Marks, Group Type Individual Students, update then save)
4. Update SIMS/Satchel with information from the Signing In Sheets.
5. Using whole school view in Lesson Monitor tick N code box to view unexplained absences. Change code appropriately for music lessons, off-timetable activities, visits, exams etc. Save.
6. Check any marking discrepancies between registration and period 1 and contact staff to clarify attendance where necessary.
7. Start first day calls to parents of absent students who have not made contact with the school and in priority order phone home working through the contact numbers and if necessary send an email message.
8. Attendance Officer to advise Pastoral Managers if no response from missing student contacts.
9. Throughout the day monitor any N code absences on the electronic registers during lesson times and contact teaching staff or pastoral team to advise a student is missing as required.

Appendix 14: Individual Student Behaviour Risk Audit

Pupil's Name:	Date
Assessor's Name	Review Date

[illegible]

Completing the Risk Audit

Note: The primary function of the risk audit pro forma set out overleaf is that of a diagnostic tool, allowing for the compilation of an accurate and comprehensive individual pupil behaviour profile. It is also possible to use the same form for carrying out a formal risk assessment, although in cases where numerous or detailed control measures are required, the 'ACTION' column may lack sufficient space.

- Consider what sorts of behaviour are likely to be exhibited by the pupil in question. What hazards might arise as a result of the behaviour? Find out if there is a pattern to the behaviour. Does it happen at a particular time or place? Is there something usually going on immediately before or after? Is there any way of predicting it? Are there circumstances which make the behaviour more likely to occur?
- Based on past evidence, common sense and likelihood of occurrence, think about the impact of this behaviour - who is likely to be harmed and how? **Life-threatening** = fatality, hospitalisation, long-term absence etc; **Serious** = requiring medical treatment and, usually, absence from work; **Harm** = e.g. 1st Aid, possible GP check-up and/or treatment.
- How likely is this behaviour? How frequently has the behaviour happened in the past? How recently? Is it possible to make realistic predictions for the future? On what grounds? (NB: Where more than one form of poor behaviour has been identified, the combined impact of *all* of them should be considered when determining the likelihood and frequency of harm arising).
- Calculate the numerical risk factor by multiplying **likelihood x frequency x harm**. Any resulting percentage greater than 1 per cent indicates a measure of risk; a figure of 100 per cent means it is certain to happen.
- Evaluate the risks and decide what recommendations might be made for further action. Is a full risk assessment required, together with suitable control measures? Are existing precautions – where applicable – sufficient, or should further steps be taken?
- It is important that the 'percentage chance' of harm occurring is not seen as a single, authoritative predictor of future outcomes.
- It is merely one indicator of several which can assist those charged with tackling such behaviour in schools. The action to be taken will clearly depend on the type(s) of behaviour identified. A ten per cent chance of a pupil carrying a knife, for example, clearly poses a greater level of possible harm than a ten per cent chance of a pupil verbally abusing somebody. As a general rule, any percentage risk of more than one per cent should be closely analysed, and where the potential harm is calculated as a score of two or more, this becomes even more important.
- Decide when this audit should be reviewed (for example, in 6 months' time, or sooner if behaviour patterns change). If a formal risk assessment is required, then reviews should follow automatically as part of the risk assessment process.

PUPIL BEHAVIOUR RISK ASSESSMENT

NOTE: Risk assessments should be carried out by a suitably competent person, who has received an appropriate level of training and guidance prior to fulfilling this function.

Pupil Name
Year Group
Assessor
Date

What health and safety hazards arise or could arise from the behaviour of this pupil?	
1 What risks do they pose and to whom?	LEVEL OF RISK: High/Medium/Low
2 What has been done so far to remove or reduce the risks?	REMAINING RISK: High/Medium/Low
3 What further action is required to reduce the risk further?	LEVEL OF RISK ONCE ALL CONTROL MEASURES ARE IN PLACE (High/Medium/Low):
4 List any activities which <u>cannot</u> be safely managed, as far as it is possible to foresee.	

Any further comments:

Review Date:

'MENU' of possible options to consider as control measures

Note: This list is indicative of the types of interventions which might be applied. It is not intended to be an exhaustive list, and those carrying out the risk assessment should seek to implement a tailored strategy to address the specific needs of the student within existing school behaviour and/or special needs policies. Measures set out in IEPs will clearly always take priority over any others.

Tackle offensive behaviour through school discipline Policy, with consistent application of sanctions every time the behaviour is repeated

Behaviour chart for each day

Requires clear/explicit tasks of short duration

Use non-confrontational strategies

Immediate withdrawal from lesson or area as a consequence of certain pre-determined acts, such as swearing at staff

Specific instructions given to staff not to try to stop if they attempt to leave a room, instead allowed to go to field and walk until calmed down

Look at the possible fixed term removal of pupil from lessons in which the offensive behaviour is most evident, during which time s/he receives appropriate support.

Seek funding for an increase in deployment of classroom assistant/behaviour mentor support. Behaviour contract after fixed term exclusion and meeting with parent(s)/carer(s)

Withdrawal from danger areas i.e. practical classrooms, labs, mobile classrooms where teacher is isolated, lessons involving teachers where there appears to be a personality clash

To meet behaviour mentor each morning for briefing

Make it clear to both pupil and parents that further incidents of harassment of school staff will result in the police being contacted and a complaint of harassment being made, with redress sought via anti-harassment legislation.

Use experienced teacher call-out if required: "refer to head of department/head of year/senior teacher"

Procedures put in place where a senior member of staff can be called to a class immediately should an incident arise or where signs of an impending incident are apparent.

Appendix 16: Traffic light

	0-4 YEARS	5-7 YEARS	8-12 YEARS	13-15 YEARS	16-18 YEARS
Green light behaviours are: Green light behaviours provide opportunities to talk, explain and provide support	<ul style="list-style-type: none"> Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual Appropriate to the child's age and/or stage of development Activities or play among equals in terms of age, size and ability levels About understanding and gathering information, balanced with curiosity about other parts of life Example green light behaviours for a developmental age of 0-4 years include: <ul style="list-style-type: none"> Comfortable being nude Body touching and holding own genitals Unselfconscious masturbation Interest in body parts and functions Wanting to touch familiar children's genitals during play, toilet or bath times Participation in games involving looking at and/or touching the bodies of familiar children e.g. "show me yours and I'll show you mine" Asking about or wanting to touch the breasts, bottoms or 	<ul style="list-style-type: none"> Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual Appropriate to the child's age and/or stage of development Activities or play among equals in terms of age, size and ability levels About understanding and gathering information, balanced with curiosity about other parts of life Example green light behaviours for a developmental age of 5-7 years include: <ul style="list-style-type: none"> Increased sense of privacy about bodies Body touching and holding own genitals Masturbation with increasing awareness of privacy Curiosity about other children's genitals involving looking at and/or touching the bodies of familiar children e.g. "show me yours and I'll show you mine" Curiosity about sexuality e.g., questions about babies, gender, relationships, sexual activity Telling stories or asking questions, using swear words, 'toilet' words or names for private parts Kissing or holding hands with known peers Mimicking or acting out observed behaviours such as pinching a bottom 	<ul style="list-style-type: none"> Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual Appropriate to the child's age and/or stage of development Activities or play among equals in terms of age, size and ability levels About understanding and gathering information, balanced with curiosity about other parts of life Example green light behaviours for a developmental age of 8-12 years include: <ul style="list-style-type: none"> Growing need for privacy Masturbation, with increasing awareness of privacy Curiosity about other children's genitals involving looking at and/or touching the bodies of familiar children e.g. "show me yours and I'll show you mine" games with peers Showing curiosity about private parts but having a respect for the privacy of others Hugging, kissing, flirting, touching with known peers Interest and/or participation in a relationship with a peer of any gender Curiosity and seeking information about sexuality Use of sexual language Exhibitionism amongst same age peers within the context of play e.g. occasional flashing or mooning 	<ul style="list-style-type: none"> Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual Appropriate to the child's age and/or stage of development Activities or play among equals in terms of age, size and ability levels About understanding and gathering information, balanced with curiosity about other parts of life Example green light behaviours for a developmental age of 13-15 years include: <ul style="list-style-type: none"> Need for privacy Masturbation in private Accessing information about sex and sexuality Viewing age and developmentally appropriate materials for sexual arousal e.g. music videos, magazines, movies Sexually explicit mutual conversations and/or use of humour and obscenities with peers Interest and/or participation in a relationship with a person of any gender Mutually consenting sexual activity for pleasure, in private, with a partner of similar developmental ability Communicating online with peers Arranging a meeting with a known peer, who they communicate with online, with the knowledge of a known adult peer or adult 	<ul style="list-style-type: none"> Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual Appropriate to the child's age and/or stage of development Activities or play among equals in terms of age, size and ability levels About understanding and gathering information, balanced with curiosity about other parts of life Example green light behaviours for a developmental age of 16-18 years include: <ul style="list-style-type: none"> Need for privacy Masturbation in private Accessing information about sexuality Viewing materials for sexual arousal e.g. music videos, magazines, movies Sexually explicit mutual conversations and/or use of humour and obscenities with peers Interest and/or participation in a relationship with a person of any gender Mutually consenting sexual activity for pleasure, in private, with a partner of similar developmental ability Communicating online with peers Arranging a meeting with an online acquaintance accompanied by a known peer or adult

	genitals of familiar adults e.g. when in the bath or shower	Supervised online communication with family or known peers	Supervised online communication with family or known peers	Communicating online with family and known peers		
<p>Orange light behaviours cause concern because of:</p> <p>Orange light behaviours signal the need to monitor and provide targeted support. They cannot be ignored and it is important to think through the options available for the child/young person.</p>	<ul style="list-style-type: none"> The persistence, intensity, frequency or duration of the behaviours The type of activity or knowledge for the age and/or stage of development Inequality in age, size, power or developmental ability Risk to the health and safety of the child or others Unusual changes in a child's behaviour <p>Example orange light behaviours for a child's behaviour</p> <p>developmental age of 0-4 years include:</p> <ul style="list-style-type: none"> Masturbation in preference to other activities Preoccupation with sexual behaviours Explicit sexual talk, art or play Persistently watching or following others into private spaces e.g. toilets, bathrooms to look at them or touch them Pulling other children's pants down or skirts up against their will 	<ul style="list-style-type: none"> The persistence, intensity, frequency or duration of the behaviours The type of activity or knowledge for the age and/or stage of development Inequality in age, size, power or developmental ability Risk to the health and safety of the child or others Unusual changes in a child's behaviour <p>Example orange light behaviours for a developmental age of 5-7 years include:</p> <ul style="list-style-type: none"> Persistent rubbing / touching own genitals after redirection Masturbation in preference to other activities in public; with others and/or causing self-injury Explicit talk, art or play of sexual nature Playing / attempting to play "show me yours and I'll show you mine" games with significantly older or younger children Persistent attempts to touch the genitals of other children Persistent interest in touching or viewing other people's private body parts / private activities 	<ul style="list-style-type: none"> The persistence, intensity, frequency or duration of the behaviours The type of activity or knowledge for the age and/or stage of development Inequality in age, size, power or developmental ability Risk to the health and safety of the child or others Unusual changes in a child's behaviour <p>Example orange light behaviours for a developmental age of 8-12 years include:</p> <ul style="list-style-type: none"> Masturbation in preference to other activities, in public and/or causing self-injury or persistent explicit talk, art or play which is sexual or sexually intimidating Intentional viewing of other people's private body parts / private activities Marked changes to behaviour e.g. mimicking older or adult flirting behaviours, seeking relationships with older children or adults in preference to peers 	<ul style="list-style-type: none"> The persistence, intensity, frequency or duration of the behaviours The type of activity or knowledge for the age and/or stage of development Inequality in age, size, power or developmental ability Risk to the health and safety of the child or others Unusual changes in a child's behaviour <p>Example orange light behaviours for a developmental age of 13-15 years include:</p> <ul style="list-style-type: none"> Sexual preoccupation which interferes with daily functioning more than two years age difference, developmental ability and/or peer grouping Viewing age and developmentally inappropriate materials for sexual arousal e.g. music videos, magazines, movies Indication of sexually transmitted infection or pregnancy Viewing of others while they are engaged in sexual activity or nudity Explicit communications, art or actions which are obscene or sexually intimidating Sexual activity in exchange for material items or privileges Exposure of private parts in a public place with peers e.g. flashing Unsafe sexual behaviour, including unprotected sex, sexual activity while intoxicated, multiple 		

	<ul style="list-style-type: none">• Touching the genitals/private parts of other children in preference to other activities• Attempting to touch or touching adults on the breasts, bottom, or genitals in ways that are persistent and/or invasive• Touching the genitals/private parts of animals after redirection• Recurrent urinary tract infections• Communicating online with known people which may include giving out personally identifying details	<ul style="list-style-type: none">• Persistent questions about sexuality despite being answered• Persistent nudity and/or exposing private parts in public places• Touching genitals/private parts of animals after redirection• Recurrent urinary tract infections• Communicating online with known people which may include giving out personally identifying details	<ul style="list-style-type: none">• Simulation of sexual activities e.g. oral sex, sexual intercourse with clothes on• Mutual /self-masturbation with known and unknown peers• Hugging, kissing, flirting, touching with unknown peers• Accessing age restricted materials e.g. movies, games, internet with sexually explicit content• Persistent expression of fear of sexually transmitted infection or pregnancy• Recurrent urinary tract infections• Communicating online with known people which may include giving out personally identifying details	<ul style="list-style-type: none">• Include giving out personally identifying details• Communicating online to send or publish sexual images, videos or audio of self or another person with or without their consent• Arranging a meeting with an online acquaintance accompanied by a peer or known adult	<ul style="list-style-type: none">• Indication of sexually transmitted infection or unplanned pregnancy• Arranging a meeting with an online acquaintance with the knowledge of a known peer or adult	partners and/ or frequent change of partner <ul style="list-style-type: none">• Indication of sexually transmitted infection or unplanned pregnancy• Arranging a meeting with an online acquaintance with the knowledge of a known peer or adult
Red light behaviours indicate or cause harm because they are: Red light behaviours signal the need to provide immediate protection and follow up support.	<ul style="list-style-type: none">• Excessive, compulsive, coercive, forceful, degrading or threatening• Secretive, manipulative or involve bribery or trickery• Not appropriate for the age and/or stage of development• Between children with a significant difference in age, developmental ability or power• Abusive or aggressive <p>Example red light behaviours for a developmental age of 5-7 years include:</p> <ul style="list-style-type: none">• Rubbing / touching own genitals to the exclusion of usual activities	<ul style="list-style-type: none">• Excessive, compulsive, coercive, forceful, degrading or threatening• Secretive, manipulative or involve bribery or trickery• Not appropriate for the age and/or stage of development• Between children with a significant difference in age, developmental ability or power• Abusive or aggressive <p>Example red light behaviours for a developmental age of 8-12 years include:</p> <ul style="list-style-type: none">• Compulsive masturbation e.g. self-injurious, seeking an audience	<ul style="list-style-type: none">• Excessive, compulsive, coercive, forceful, degrading or threatening• Secretive, manipulative or involve bribery or trickery• Not appropriate for the age and/or stage of development• Between children with a significant difference in age, developmental ability or power• Abusive or aggressive <p>Example red light behaviours for a developmental age of 13-15 years include:</p> <ul style="list-style-type: none">• Compulsive masturbation e.g. self-injurious, seeking an audience• Engaging vulnerable others in a process to gain sexual gratification by using grooming techniques, e.g. gifts, lies, flattery	<ul style="list-style-type: none">• Excessive, compulsive, coercive, forceful, degrading or threatening• Secretive, manipulative or involve bribery or trickery• Not appropriate for the age and/or stage of development• Between children with a significant difference in age, developmental ability or power• Abusive or aggressive <p>Example red light behaviours for a developmental age of 16-18 years include:</p> <ul style="list-style-type: none">• Compulsive masturbation e.g. self-injurious, in public, seeking an audience		

	<p>developmental age of 0-4 years include:</p> <ul style="list-style-type: none"> • Compulsive masturbation which may be self-injurious, of a persistent nature or duration • Persistent explicit sexual themes in talk, art or play • Disclosure of sexual abuse • Simulation of sexual touch or sexual activity • Persistently touching the genitals/ private parts of others • Forcing other children to engage in sexual activity • Sexual behaviour between young children involving penetration with objects, masturbation of others, oral sex • Indication of a sexually transmitted infection • Communicating online with known and unknown people which may include giving out personally identifying details and / or sexual images or videos 	<ul style="list-style-type: none"> • Masturbation that is compulsive, self-injurious, or seeking an audience • Rubbing own genitals on other people • Disclosure of sexual abuse • Simulation of sexual touch or sexual activity • Forcing other children to play sexual games • Sexual knowledge beyond expected for age or stage of development • Indication of a sexually transmitted infection • Excessive talk about sex and sexual activity • Communicating online with known and unknown people which may include giving out personally identifying details and / or sexual images or videos 	<ul style="list-style-type: none"> • Persistent bullying involving sexual aggression e.g. pulling/ lifting/removing other children's clothing, sexually threatening notes, sending sexually explicit material, drawings, text messages • Degrading or humiliating self or others using sexual themes • Disclosure of sexual abuse • Accessing the rooms of sleeping children to touch or engage in sexual activity • Touching another person's genitals without permission • Sexual activity or penetration of animals • Sexual penetration of dolls and/or stuffed toys • Participating in or simulating intercourse and/or oral sex with known or unknown peers with clothes off • Sexual activity in exchange for material items or privileges • Indication of sexually transmitted infection or pregnancy • Communicating online with unknown people which may include giving out personally identifying details • Communicating online with known and unknown people to send or publish sexual images, videos or audio of self or another person 	<ul style="list-style-type: none"> • Force or coercion of others into sexual activity • Disclosure of sexual abuse/ sexual assault • Sexual activity or penetration of animals • Sexual penetration of dolls and/or stuffed toys • Unsafe sexual activity, including unprotected sex, sexual activity while intoxicated, multiple partners and/ or frequent change of partner • Sexual activity in exchange for material items or privileges • Sexual contact with others of significant age and/or developmental ability • Creating, possessing, accessing or sending child exploitation materials • Harassing or coercing others to take or send sexual images videos or audio • Harassing or coercing others to take or send sexual images videos or audio of another person without their consent • Deliberately sending and/or publishing sexual images videos or audio of another person without their consent • Arranging a meeting with an online acquaintance without the knowledge of a known peer or adult 	<ul style="list-style-type: none"> • Preoccupation with sexually aggressive and/or illegal pornography • Disclosure of sexual abuse/ sexual assault • Sexual contact and activities with animals • Forcing or manipulating others into sexual activity • Engaging others in a process to gain sexual gratification by using grooming techniques e.g. gifts, manipulation, lies • Creating, possessing, accessing or sending child exploitation materials • Harassing or coercing others to take or send sexual images videos or audio • Deliberately sending or publishing sexual images videos or audio of another person without their consent • Arranging a meeting with an online acquaintance without the knowledge of a known peer or adult
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Appendix 17a: Safeguarding Concerns Form – Allegations Against Staff

CONFIDENTIAL

To be completed following the reporting of a safeguarding concern relating to a staff member or volunteer within the school. This may relate to a specific incident, or may relate to an individual's general behaviour with or around pupils.

This form can be completed collaboratively with the Headteacher, or the staff member may wish to complete the form themselves and return via secure email.

Where the concern relates to the Headteacher the central HR team or a senior member of the education team will complete the form with input from the staff member raising the concern.

DETAILS OF THE PERSON TO WHOM THE CONCERN RELATES

Name of staff member/volunteer	
Job title of staff member/volunteer	

DETAILS OF THE PERSON RAISING THE CONCERN (Add N/A if the concern has not been reported by a staff member)

Name	
Job title	
Date concern raised	

DETAILS OF THE PERSON WHO HAS RECEIVED THE CONCERN

Name	
Job title	
Date concern raised	

What is the nature of the allegation/concern?

--

If the allegation/concern relates to a specific incident include the following details

Date of incident	
Time of incident	
Location of incident	
Were there any other witnesses? If so, include names	

Has the staff member reporting the concerns had any previous concerns regarding this staff member/volunteer, or have concerns been raised previously?

YES/NO

If YES, please add further detail below

--

TO BE COMPLETED BY THE HEADTEACHER

Is the allegation/concern likely to meet the harms threshold?	YES/NO
Rationale for reaching this decision	

If **YES**, complete the **Safeguarding Risk Assessment – Allegations against staff** form (Appendix 1a) to assess the level of risk and follow the steps outlined in the **Safeguarding Allegations Flowchart** (Appendix 2).

If **NO**, complete the 'Agreed Actions' section below and follow the steps outlined in the **Safeguarding Allegations Flowchart** (Appendix 2).

AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, discussion with the employee regarding concerns, review of policies or processes, peer support and monitoring of future behaviour.

Action	Desired outcome	Timescale	Responsible Officer

Appendix 17b: Safeguarding Risk Assessment Form – Allegations Against Staff

CONFIDENTIAL

To be completed by the Headteacher (or HR Lead / Chair of Governors if it relates to the Headteacher) if an allegation/concern may meet the harms threshold.

The purpose of the safeguarding risk assessment is to identify:

- If there is any risk to children, young people or adults with whom the employee has contact with, in a position of trust
- Whether the allegation/concern meets the harms threshold
- How any risk identified should be best managed
- Whether the employee is safe to continue in their role
- Any future implications should the employee continue in their role

BACKGROUND

Name of staff member/volunteer	
Job title of staff member/volunteer	
Date DBS checked	
Outcome of DBS check	

Are there any children present in the household of the employee?	YES/NO/UNKNOWN
If YES, please provide gender and age details	
Gender	Age

What is the nature of the allegation/concern?

Refer to the Safeguarding Concerns – Allegations against staff form

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If the allegation/concern relates to a specific incident include the following details

Refer to the Safeguarding Concerns – Allegations against staff form if this has been completed

Date of incident	
Time of incident	
Location of incident	
Were there any other witnesses? If so, include names	

RISK ASSESSMENT FACTORS

On the basis of the evidence available, professional judgement and experience, the level of risk should be assessed as follows for the appropriate risk assessment factors below:

- Low risk (L)
- Moderate risk (M)
- High risk (H)
- Severe risk (S)

Assessment Factor:	Risk L/M/H/ S
What is the specific allegation/offences? <i>Assess the risk based on the gravity of the allegations or offence</i>	
Is the matter being dealt with by another professional agency e.g. Police or Local Authority Safeguarding Officer?	This question does not need to be rated.
If the matter is currently being dealt with by another agency, what is the current position of the investigation or intervention?	This question does not need to be rated.
How severe is the harm (threatened or inflicted) and are there any children and/or other vulnerable adults involved? <i>Assess severity of harm threatened or inflicted</i>	
Is there evidence to suggest that the harm is likely to continue or escalate? <i>Assess the risk based on the likelihood of the harm continuing or escalating</i>	
Is there evidence to suggest that the harm was premeditated? <i>Assess the likelihood of the harm involving premeditation</i>	
Is there evidence to suggest that the harm was accompanied by sustained threats or coercion? <i>Assess the likelihood of the harm involving threats or coercion</i>	
Is there a pattern of history for this type of behaviour? <i>Assess the level of risk based on previous behaviour, frequency and severity</i>	
What is the risk of harm posed to other children or adults? <i>What is the likelihood of harm to the child or adults</i>	
Have there been any previous concerns or complaints? <i>Assess the level of risk based on previous history, frequency and seriousness of issues</i>	
What has been the impact on the employee's health and wellbeing? <i>What is the level of risk based on the employee's current health</i>	
Is the employee receiving any medical support? If not, is this intended? <i>Assess the level of risk incurred from medication or existing treatment plan</i>	

RISK ASSESSMENT SUMMARY

Overall assessment of risks identified, including the risk to others:

Views and recommendations of professional agency e.g., Police/Local Authority or Safeguarding Officer
Views and recommendations of Risk Assessor
Views of Individual (if appropriate)

On the basis of the evidence available, professional judgement and experience, the level of overall risk should be assessed as follows for the appropriate risk assessment factors below:

Low risk (L): No safeguarding action is required and/or safeguarding issues have been addressed

Moderate risk (M): Safeguarding Protection Plan is required to manage the risk and/or remains in place in this area/overall

High risk (H): Safeguarding Protection Plan requires implementation. Legal action is being taken. The behaviour is persistent and/or deliberate

Severe risk (S): Life may be in danger, risk of major injury or serious physical or mental ill harm. The incidents are increasing in frequency and/or severity.

Overall Risk
Low/Moderate/High/Severe

AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, supervision, peer support alternative duties and access to occupational health services. In some circumstances suspension may be required to manage risk.

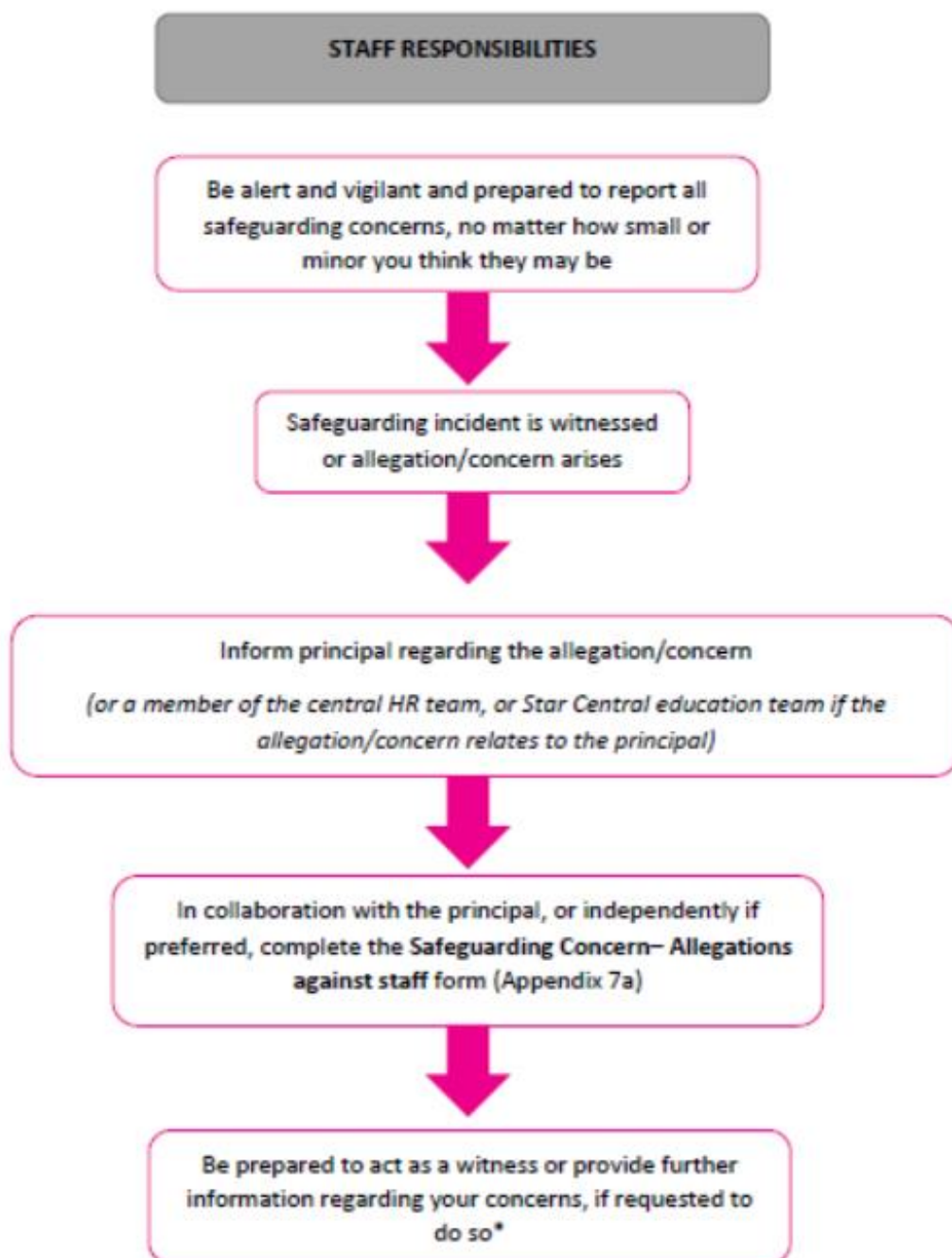
Action	Desired outcome	Timescale	Responsible Officer

Risk Assessor name	
Risk Assessor signature	
Risk Assessor job title	
Date of Risk Assessment	
Date of Review	

Appendix 17c: Safeguarding concerns spreadsheet – allegations against staff

				allegation/concern details							safeguarding concern form																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					</
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Appendix 18: Safeguarding incident involving a member of staff and a pupil (s)



*Any employee raising an allegation/concern can request anonymity, and this will be respected wherever reasonably possible. However, this may not be possible in all cases.

PRINCIPAL RESPONSIBILITIES*

*Or a member of the central HR team / senior member of the Star Central education team if the allegation/concern relates to the principal

Receive an allegation/concern and/or the
Safeguarding Concern – Allegations against
staff form (Appendix 7a)

Safeguarding incident is witnessed or
allegation/concern arises

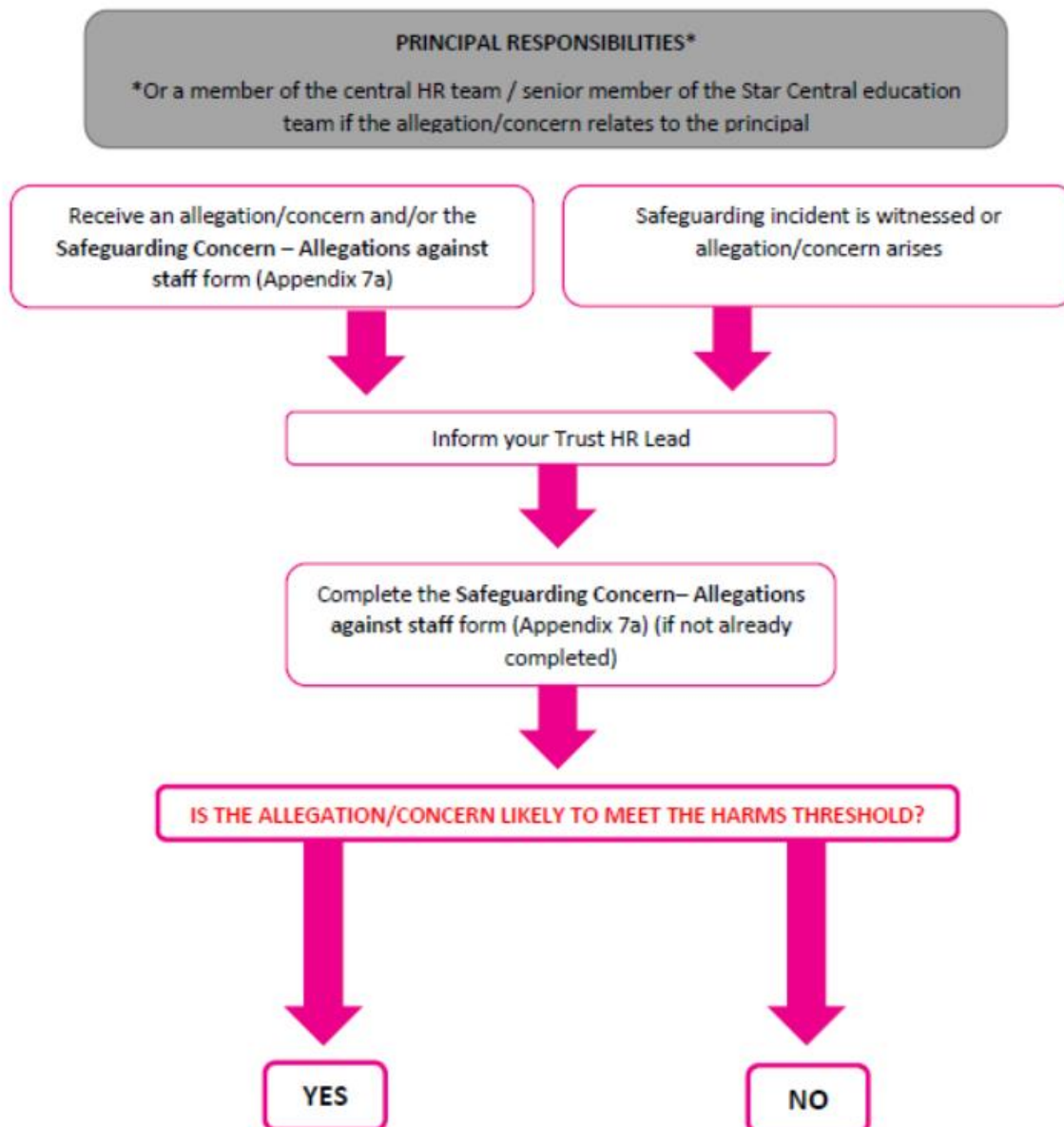
Inform your Trust HR Lead

Complete the Safeguarding Concern– Allegations
against staff form (Appendix 7a) (if not already
completed)

IS THE ALLEGATION/CONCERN LIKELY TO MEET THE HARMS THRESHOLD?

YES

NO



IS THE ALLEGATION/CONCERN LIKELY TO MEET THE HARMS THRESHOLD?

YES

WHEN DEALING WITH AN INCIDENT

- Ensure children are safeguarded
- Remove pupil and member of staff from situation
- Do not question the victim or witnesses at this stage, inform and take advice from HR first
- Inform parents/carers of pupil, if appropriate, after discussing with HR

Conduct initial fact find and contact the LADO for advice

Inform the Chair of Governors (if the allegation relates to the principal)

Complete the Safeguarding Risk Assessment – Allegations against staff form when there is sufficient information to assess the risk (Appendix 7b)

Follow the advice of HR, LADO and other professional agencies (e.g. police) as appropriate

POSSIBLE ACTIONS

- No action or informal management actions to address concerns
- Suspend employee and initiate disciplinary investigation
- Initiate disciplinary investigation with no suspension
- Attend professional strategy meeting/s

Retain a copy of the Safeguarding Concern – Allegations against staff form (Appendix 7a) and the Safeguarding Risk Assessment – Allegations against staff form (Appendix 7b) and investigation documentation in the employee's personnel file in all cases except where the allegation is found to be malicious or false.

Record case on the Safeguarding Allegations Against Staff spreadsheet (Appendix 7c)