CHILD PROTECTION AND SAFEGUARDING POLICY AND PROCEDURES

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KEY SAFEGUARDING CONTACTS

Designated Safeguarding Lead Helen Mitchell Principal Thornhill Park School 01915653965 helen.mitchell-principal@ne-as.org.uk	Laura Ingram Vice Principal 01915653965 laura.ingram@ne-as.org.uk Lucy Sinclair Vice Principal Lucy.sinclair@ne-as.org.uk Edward Maddison Safeguarding and Family Liaison Officer Edward.maddison@ne-as.org.uk 01915653965 Kate Wharry Vice Principal Kate.wharry@ne-as.org.uk	**Sunderland PREVENT team** **0191 5617007** **Channel Helpline** 020 73407264
Single Point of Contact Helen Mitchell Principal Thornhill Park School 01915653965 helen.mitchell-principal@ne-as.org.uk	Senior Management Team Tracey Train Director of Education Tracey.train@ne-as.org.uk Paul McGinnety CEO Paul.McGinnety@ne-as.org.uk Lead Trustee for Safeguarding and Chair of Trustees Dr Rakesh Chopra Trustee North East Autism Society 0191 4109974 rakesh.chopra@ne-as.org.uk	**Local Authority Designated Officer Sunderland** desinatedofficer@togetherforchildren.org.uk

Referring Local Authority Local Safeguarding Children Boards	
Sunderland	Together for Children – Sunderland: 0191 5205560 Out of Hours Team: 0191 520 5552
Gateshead	Gateshead Council Children's services: 0191 4332653 Out of hours team: 0191 4770844
Newcastle	Initial Response Service: 0191 2772500 Emergency Duty Team: 0191 2787878
South Tyneside	Children & Families Social Care: 0191 4246512 Out of hours team: 0191 4562093
North Tyneside	Front Door Service Quadrant: 0345 2000 109 Out of hours team:
Durham Local Safeguarding Children Partnership	First Contact 03000 267 979 firstcontact@durham.gov.uk
Darlington Local Safeguarding Children Board	Office hours: 01325 406252 Out of hours: 01642 524552
Northumberland	Onecall: 01670 536400 Emergency Duty Team: 0345 6005252
Redcar and Cleveland	Redcar & Cleveland Multi-agency Hub Tel: 01642 130700 Email: RedcarMACH@redcar-cleveland.gov.uk
Middlesbrough Safeguarding Children Board	Middlesbrough Multi-agency Children's Hub Tel: 01642 726004 MiddlesbroughMACH@middlesbrough.gov.uk Out of hours: 01642 524552

CHILD PROTECTION AND SAFEGUARDING POLICY AND PROCEDURES

1. AIMS

This policy aims to provide clear direction to all staff about expected understanding of:

- 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 2026 (comes into force from 1 September 2026) and Working together to safeguard children 2026, the Maintained schools: governance guide - GOV.UK and Academy trusts: governance guide - GOV.UK

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 1 of the schedule to the The Non-Maintained Special Schools which places a duty on non-maintained special schools to safeguard and promote the welfare of learners at the school

Children Act 1989 and Children Act 2004 which provides a framework for the care and protection of children

Multi-agency statutory guidance on female genital mutilation - GOV.UK which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM 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

Serious Crime Act 2015

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

Prevent duty guidance: England and Wales (2023) - GOV.UK 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 learners with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting learners (where we can show it's proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there's evidence that they'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 focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

The The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006 which set out who is disqualified from working with children.

This policy also meets requirements relating to safeguarding and welfare in the statutory framework and welfare in the EYFS statutory framework for group and school-based providers

The Crime and Policing Act 2026, which introduces several changes and enhancements supporting schools in relation to mandatory reporting by the police of key crimes against children, (child sexual abuse, knife crime, hate crime, protection of children and vulnerable adults).

Operation Encompass Statutory Guidance: a program aimed at safeguarding children who experience domestic abuse. It requires police forces in England and Wales to notify educational establishments such as school, when a child is the victim of domestic abuse at home. The notification being made before the next school day, ensuring that the child's educational setting can provide timely support. The program also includes training for educational staff to recognise and respond to children affected by domestic abuse. https://www.operationencompass.org/

This safeguarding policy refers to Durham County Councils procedures that have been put in place. Thornhill Park School works with the following referring local authorities therefore, links to these local authorities multi-agency procedures are included below:

Children's Services	Office hours	Out of hours	Email
Sunderland	0191 5205560	0191 520 5552	Safeguarding.Children@togetherforchildren.org.uk
Gateshead	0191 4332653	0191 4770844	Online referral
South Tyneside	0191 4246512	0191 4562093	SafeguardingChildrenBoard@southtyneside.gov.uk
North Tyneside	0345 2000 109	0191 200 6800	North Tyneside Safeguarding Children Partnership (northtynesidescp.org.uk)
Newcastle	0191 2772500	0191 2787878	Susan.Kirkley@newcastle.gov.uk
Redcar &	01642 130700	01642 524552	RedcarMACH@redcar-cleveland.gov.uk

Cleveland			
Hartlepool	01429 284284	01642 524552	childrenshub@hartlepool.gov.uk
Durham	03000 267 979	03000 267 979	firstcontact@durham.gov.uk
Darlington	01325 406252	01642 524552	childrenfrontdoor@darlington.gov.uk
Northumberland	01670 536400	0345 6005252	Webform https://online.northumberland.gov.uk/citizenportal/form

3. DEFINITIONS

Safeguarding and promoting the welfare of children means:

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

CHILD PROTECTION is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

ABUSE is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 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 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. This also includes pseudo-images (AI generated intimate images, KCSIE P.191 2026) that are computer-generated images that otherwise appear to be a photograph or video.

CHILDREN include 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:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

- The chief officer of police for a police area in the LA area

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.

1. EQUALITY STATEMENT

Some children have an increased risk of abuse, 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 (SEN) or disabilities 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 (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously look after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose Parent/Carer has expressed an intention to remove them from school to be home educated

2. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees 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.

School plays a crucial role in preventative education. This is in the context of an inclusive whole-school approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment and racism.
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 female genital mutilation (FGM) and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable
  - British Values

5.1 All Staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will 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)

All staff will provide a safe space for learners who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education/who are absent from education. The Family help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- 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)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection
- That mental health can develop into safeguarding issues (P45 KCSIE 2026) and take appropriate action to support the pupil.

All staff should be aware of the process for community-based Family Help assessments:

•The criteria, including the level of need, for when a case should be referred to Family Help support and services provided at:
• Targeted Family help (previously early Help) level (under sections 10 and 11 of the Children Act 2004), and
• Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)
• Criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
• Section 31 of the Children Act 1989 (care and supervision orders), and Section 20 of the Children Act 1989 (duty to accommodate a child)

Staff should be aware of the clear procedures and processes for cases relating to: abuse, neglect, and exploitation of children, children managed within the youth secure estate and disabled children

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures

Safeguarding issues

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:
• Drug taking and/or alcohol misuse
• Unexplainable and/or persistent absences from education
• Serious violence, criminal exploitation (including that linked to county lines), radicalisation
• Consensual and non-consensual making or sharing of nudes or semi nudes.

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex A.

Section 16 and appendix 4 of this policy outline in more detail how staff will complete this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Helen Mitchell (Principal). The DSL takes lead responsibility for child protection and wider safeguarding. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep learners safe online.

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

The DSL can also be contacted out of school hours in the event of an emergency by emailing helen.mitchell-principal@ne-as.org.uk. or phoning 07875047218

When the DSL is absent, the deputies are Lucy Sinclair, Laura Ingram and Kate Wharry. The school also has a Safeguarding and Welfare Officer, Edward Maddison. (see page 2 for contact details).

In the instance that both the DSL and Deputy DSL are absent from school, the administration office should be contacted; Elmswood (0191 565 39656) or Portland (0191 516 3961) and an email should be sent to Edward Maddison (Family liaison Officer) to be escallated.

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

The DSL team will:

- 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
- Ensure that staff have appropriate prevent training
- Our Prevent lead is Helen Mitchell

The DSL will also:

- 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 Information sharing and managing the child protection file
The Designated Safeguarding Lead (DSL) is responsible for ensuring that child protection files are kept

up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information. Records should include:

- Maintain clear, accurate, and up-to-date safeguarding records, including:
  - A comprehensive summary of the concern.
  - Details of actions taken, follow-up activities, and how concerns were resolved.
  - Decisions made, outcomes achieved, and any ongoing support required.
- Ensure safeguarding and child protection files are only accessed by staff with a legitimate need to know and that information is shared securely and in accordance with information-sharing guidance.
- Put effective arrangements in place to ensure safeguarding information is transferred, reviewed, and acted upon promptly at all transition points, including in-year transfers.
- The Designated Safeguarding Lead (DSL) will ensure child protection files are transferred securely and separately from the main pupil record:
  - Within 5 days of an in-year transfer.
  - Within the first 5 days of the start of a new term for other transfers.
  - Confirmation of receipt must be obtained.
- When transferring files, provide a clear and structured summary of:
  - Current safeguarding concerns.
  - Relevant contextual information.
  - Ongoing support and intervention needs.
- Clearly distinguish between current safeguarding concerns and historical information, ensuring records provide appropriate context and focus on current risks and needs.
- Receiving schools or colleges must ensure safeguarding information is reviewed by an appropriately trained member of staff and used to support, not disadvantage, the child.
- Where safeguarding information is unclear or incomplete, the receiving setting should seek clarification promptly.
- The DSL must ensure relevant staff with safeguarding responsibilities, are informed on a need-to-know basis.
- Consider sharing additional relevant safeguarding information, where lawful and appropriate, to support the child's welfare, educational outcomes, and the safety of others. This may include information relating to:
  - Previous involvement of a social worker.
  - Experiences of abuse or neglect.
  - Concerns regarding serious violence, exploitation, or harmful behaviours.
  - Current support through programmes such as Channel.
- Wherever appropriate, DSLs from both settings should communicate directly to ensure safeguarding information is understood, considered, and acted upon effectively.

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

5.3 Governance

Governance will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront 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 Principal 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 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 the school has a policy in respect to the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect learners
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. 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
  - 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 those 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 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

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

The Director of Education/Chief Executive officer will act as the 'case manager' if an allegation of abuse is made against the Principal, where appropriate (see appendix 3).

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

5.4 The Principal

The Principal 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 when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- 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)
- Ensuring the relevant staffing ratios are met
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring that the relevant staffing ratios are met where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person overseeing the safe use of technology, mobile phones and cameras in the setting

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

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of learners with a social worker and have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs special educational needs coordinators (SENCOs), social workers, mental health leads and others.

6 CONFIDENTIALITY

Please refer to Thornhill Park School's Data Protection (GDPR) Policy.

All personal information will be retained in line with the Society's Record Keeping and GDPR and Data

Protection Policy. All written records will be kept in a secure area and system which is access controlled. All records will also be destroyed in line with our records management policy. We will ensure that access is available for those who need to know, but for all others it will remain absolutely confidential. Please refer to Thornhill Park School's Data Protection (GDPR) Policy.

Thornhill Park School will ensure:

- Timely information-sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- 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, Data (Use and Access) Act 2025, and the 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 (including personal information), and will support staff who have to make decisions about sharing information
If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3

7 RECOGNISING ABUSE AND TAKING ACTION

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

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

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

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

Make a referral to local authority 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.

Referring Local Authority Local Safeguarding Children Boards	
Sunderland	Together for Children – Sunderland: 0191 5205560 Out of Hours Team: 0191 520 5552
Gateshead	Gateshead Council Children's services: 0191 4332653 Out of hours team: 0191 4770844
Newcastle	Initial Response Service: 0191 2772500 Emergency Duty Team: 0191 2787878
South Tyneside	Children & Families Social Care: 0191 4246512 Out of hours team: 0191 4562093
North Tyneside	Front Door Service Quadrant: 0345 2000 109 Out of hours team:
Durham Local Safeguarding Children Partnership	First Contact 03000 267 979 firstcontact@durham.gov.uk
Darlington Local Safeguarding Children Board	Office hours: 01325 406252 Out of hours: 01642 524552
Northumberland	Onecall: 01670 536400 Emergency Duty Team: 0345 6005252
Redcar and Cleveland	Redcar & Cleveland Multi-agency Hub Tel: 01642 130700 Email: RedcarMACH@redcar-cleveland.gov.uk
Middlesbrough Safeguarding Children Board	Middlesbrough Multi-agency Children's Hub Tel: 01642 726004 MiddlesbroughMACH@middlesbrough.gov.uk Out of hours: 01642 524552

Child abuse can also be reported to the local council – please follow the link below:

https://www.gov.uk/report-child-abuse-to-local-council

7.1 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
- Complete a CPOMs record as soon as possible, to alert the DSL in the child's own words. Stick to the facts, and do not put your own judgement on it. In situations where there is a potential that the child is at risk of harm, speak to a DSL immediately.
- 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

If someone discloses that they have experienced or are experiencing abuse, you should not:

- Investigate they are simply listening to what the person has to tell them. Open questions should be asked, such as "what did you mean by that?" Care should be taken that words are not put into the person's mouth by asking leading questions such as "when you said that did you mean….?"
- Stop someone who is freely recalling significant events, as they may not speak about it again.
- Promise to keep secrets. Even if the person asks not to tell anyone, it must be explained in a way they understand, that we have a Duty of Care to passon the information. It may help to explain that the information is only being passed to those who 'need to know' and that this is being done because of the concerns about them
- Give unrealistic expectations or guarantees regarding confidentiality or safety by saying, for example, "Don't worry this will never happen to you again."
- Be judgmental.
- Tell anybody that doesn't need to know.
- Contact the alleged perpetrator or anyone who might be in touch with him or her.

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.

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

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

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

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

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

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

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

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

The duty for teachers mentioned above does not apply in cases where a learner is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.
Please follow this link below to access local procedures regarding FGM:

FGM-M-A-Procedure-1.docx

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

Family help Assessment

If an Family 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 Family 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.

Please follow link below to access local procedures for Family help:

Family help - Together for Children

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), you must tell the DSL as soon as possible.

The local authority will make a decision within one 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.
Please find link below to access local procedures for referral and escalation:
Family help - Together for Children

7.5 If you have concerns about extremism:

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

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

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

The Department for Education also has a dedicated telephone helpline,020 734 7264, which school staff and governors can call to raise concerns about extremism with respect to a learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

7.6 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.
Mental health problems, in some cases, can develop into safeguarding concerns (for example, self-harm).

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

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

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

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

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

Further information regarding procedures for identifying possible mental health problems including routes to escalate and referral can be found in the School's Mental Health Policy 2024.

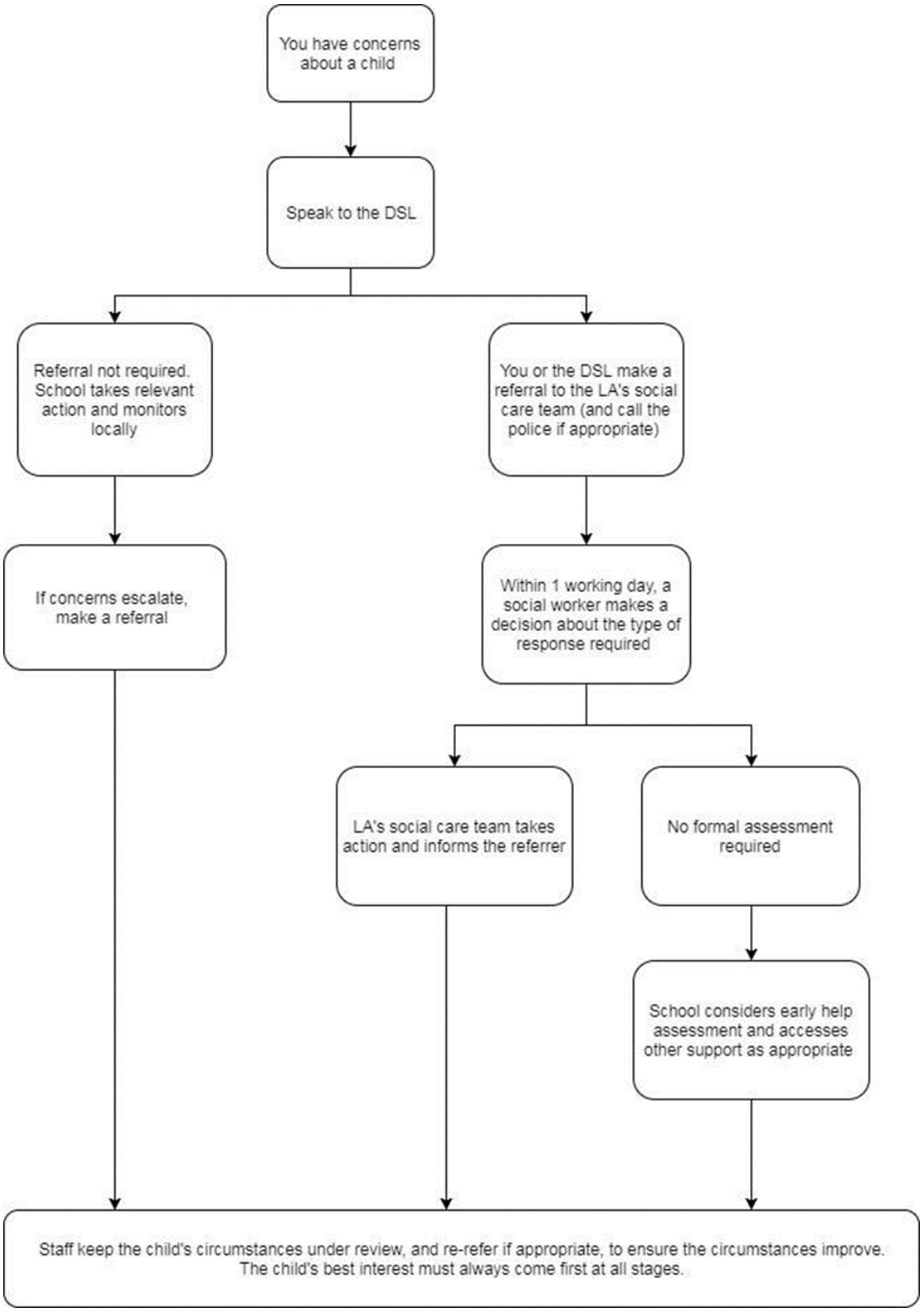
If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

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

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

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 or trainee teacher, volunteer or contractor

Any allegation or concern regarding a staff member (including a supply or trainnee teacher, volunteer or contractor), must be reported directly to the Principal, together with completion of the Staff Allegation/Concern Reporting Form. Where the allegation or concern involves the Principal, it must instead be reported immediately to the Director of Education, with the completed form submitted directly to them. In all cases involving safeguarding or child protection, where there is risk of harm to a child, the Local Authority Designated Officer (LADO) must be informed without delay, in line with statutory requirements.

The full reporting and investigation procedure is provided in Appendix 3. All staff must be familiar with this procedure and follow it immediately when a concern arises.

The Principal/Director of Education will then follow the procedures set out in Appendix 3, if appropriate.

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 Society's senior management team 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 young people, follow our school safeguarding policies and procedures.

Early Years
Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other learners:

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up", or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.
For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.
Most cases of 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 making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

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

Procedures for dealing with allegation of child-on-child abuse:

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

- You must record the allegation and tell the DSL, but do not investigate it

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Follow the school reporting and recording procedure in line with child protection and safeguarding

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

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

To achieve this, we will:

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

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

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

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident 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 LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.9 Sharing of nudes or semi-nudes (`sexting`):

The following approach is based on guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident:

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a learner to share or

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

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

Initial review meeting:

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

- Whether there is an immediate risk to learner(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the 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 learners involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the learners involved (in most cases parents should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
  - The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any learner in the images or videos is under 13
- The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of the nudes or 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 Principal 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 risk.

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

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

Informing parents/carers:

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

Referring to the police:

If it is necessary to refer an incident to the police, this will be done through contacting the police community support officer, local neighbourhood police, and/or dialing 101.

Recording incidents:

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage:

Learners are taught about the issues surrounding sharing of nudes, semi-nudes or AI generated images as part of our Relationships Sex Education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes or AI generated images:

- 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. This also includes making such images, including where generated by AI

Issues of legality

- The risk of damage to people's feelings and reputation

Learners also learn the strategies and skills needed to manage

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

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

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding

- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our learners:

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for learners to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for learners
- Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Learners are aware of how to report concerns through regular tutorials and relationship, sex education. Safeguarding posters and easy read guides on how to report concerns are available to all learners in a range of formats.

8. Contextualised Safeguarding

Thornhill Park School's approach to *contextualised safeguarding:* recognising that children and young people may experience harm outside the home and beyond parental influence, including in peer groups, public spaces, online, and in community settings. It applies to all pupils, staff, volunteers, contractors, and visitors, with particular attention to the heightened vulnerability of pupils with special educational needs or disabilities (SEND). It is further recognised that, as our children and young people progress to become more independent in their life, although positive, brings increased levels of risk.

All staff must actively identify contextual risks, including:

- Bullying or peer-on-peer abuse in school or during off-site activities
- Vulnerabilities when travelling to or from school
- Risks in local community areas frequently visited by pupils
- Online risks, including social media and messaging apps
  Risk assessments must be conducted for new or ongoing activities, and contextual information (peer networks, locations, behavioural triggers) must be included in safeguarding reports.

Where extra familial harm is identified, the Designated Safeguarding Lead (DSL) must coordinate with:

- Safeguarding.Children@togetherforchildren.org.uk
- Local police safeguarding units
- Youth support services

- Families and carers
- Community organisations: Multi-agency contextual assessments must map risks in peer groups, neighbourhoods, and online spaces and result in coordinated intervention plans.

The school will maintain:

- Supervised outdoor and recreational spaces, tailored to the needs of SEND pupils
- Tracking of pupils' routes to and from school and risk mitigation plans where necessary
- Collaboration with local shops, bus services, and community centres to ensure safe engagement of pupils in the local area
- Behavioural monitoring that identifies potential peer-on-peer exploitation or grooming dynamics within the school

Staff must assess and monitor pupils' online activity, including social media, messaging apps, and online gaming, to identify potential extra-familial risks. Pupils will receive tailored digital safety education suitable for their cognitive and emotional understanding.

DSLs will liaise with the Safeguarding.Children@togetherforchildren.org.uk for referral and support. Emergency safeguarding concerns in the Sunderland area can be reported via the local police safeguarding team or out-of-hours social care.

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

The 4 key categories of risk:

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

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- Contact – being subjected to harmful online interaction with other users or generative AI applications that stimulate this, such as peer-to-peer pressure, commercial advertising and

adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), including those generated by AI and online bullying 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 an address the risks above we will:

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

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring learners are encouraged to do so, including where they are a witness rather than a victim

- We will train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents events. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when learners are not present
- Staff will not take pictures or recordings of learners on their personal phones or cameras

Make all learners, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the DfE's guidance on searching, screening and confiscation

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by the Safeguarding and Family Liaison Officer with the support of our DSL and IT support

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.

For early years only:
In line with paragraph 36 of the Early Years Foundation Stage statutory framework, the school takes the safety and privacy of children very seriously. Personal mobile phones and cameras are not to be used in areas where children are present, including classrooms, play areas, and bathrooms, to prevent any risk of inappropriate use, staff are aware of the designated areas where personal mobile phones may be used. Staff must only use school-provided devices for taking photographs or videos of children, and these images must be stored securely and used solely for educational or developmental purposes with parental consent. Any images or recordings must never be shared on personal social media or external platforms. Visitors, including parents, must also comply with these guidelines, ensuring that mobile devices and cameras are used responsibly and only with explicit permission from the setting.

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.

9.1 Artificial intelligence (AI)

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

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

Thornhill Park School will treat any use of AI to access harmful content or bully learners in line with this policy and our anti-bullying policy.

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

10. Notifying parents or carers:

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents 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 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)

11. LEARNERS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES or HEALTH ISSUES

We recognise that learners with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding challenges, both online and offline. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners
- The potential for learners with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges is that they do not understand what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for learners with SEN and disabilities. This includes:

- Weekly group and/or 1:1 tutorial
- Whole school events
- Identified circle of support to ensure learners have safe people to talk to
- NSPCC themes

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

12. LEARNERS WITH MEDICAL CONDITIONS

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

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

13. YOUNG CARERS

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

14. LEARNERS WITH A SOCIAL WORKER

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

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

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

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

15. 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, Helen Mitchell , who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. She is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the Helen Mitchell 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.

16. LEARNERS WHO ARE LESBIAN, GAY OR BISEXUAL

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

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

17. LEARNERS WHO ARE QUESTIONING THEIR GENDER

17.1 Supporting pupils who are questioning their gender

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

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

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

The DSL will lead in these cases.

17.2 Involving parents/carers in cases of pupils questioning their gender

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

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

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

17.3 Considering requests for support with social transition

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

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

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

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

- The school will ensure that the decision-making process is documented and records are kept.

- The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

17.4 Rules on single-sex spaces

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

17.5 Rules on single-sex sports

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

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

18. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

18.1 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).

18.2 Other complaints:

Thornhill Park School is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff to share the same values. The school has a Complaints and Appeals Policy to handle other complaints for example those related to learners or premises.

18.3 Whistle-blowing

Thornhill Park School is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff to share the same values. The school has a whistle blowing policy in place that highlight the procedures in place.
Whistle-blowing is a process that enables employed staff to raise serious concerns in the workplace and to have these concerns properly addressed. There may be allegations or concerns of abuse which implicate a member or members of staff. A member of staff may have concerns about the conduct or behaviour of a colleague. Despite working closely together or even socialising outside of work, the Duty of Care necessitates the matter being raised, in accordance with safeguarding procedures.

Front-line staff are often the first to see or suspect misconduct, but are often worried about raising concerns. They may worry that they are being disloyal to their colleagues or are worried about the consequences of coming forward. It is recognised that whistle-blowing is often seen in a negative light and that this negativity has been perpetuated for many years. Consequently it is difficult for staff to see the positives but this needs to be encouraged. A good starting point is to ensure open, honest and effective communication amongst staff teams and within the service. Where this is the case, staff should begin to feel more confident and positive about coming forward with ideas, thoughts, suggestions and concerns. All managers must ensure that they listen to their staff and support them in this. The policy which is available to all staff is designed to support staff to come forward with their concerns, and relay confidence that they will be supported throughout the process.
Thornhill Park School has a whistle blowing policy in place that highlight the procedures in place.

19. 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 actions taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection electronic file for each child and should only be accessed by those who need to see it.

Non-confidential records will be easily 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 promptly and securely, and separately from the main learner file.

To allow the new school/college to have support in place when the child arrives, this should be within: five days for an in-year transfer, or within, the first five 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. Thornhill Park School holds records in line with our Retention Schedule.

Thornhill Park School shares information with other agencies when this is appropriate, in line with Sunderland Councils Safeguarding Children Board procedures.

Both paper based and electronic records are stored securely in line with GDPR procedures.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre- employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made againststaff.

20. TRAINING

20.1 All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and on 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 three safeguarding partners.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

Have regard to the Teacher Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all learners

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
Staff will also receive regular safeguarding and child protection updates, including on online safety, (for example, through emails, e- bulletins and staff meetings) as required, but at least annually.

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.

20.2 The DSL and deputies:

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

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

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

20.3 Governance and Trustees

All trustees receive training about safeguarding and child protection (including online safety). 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 Director of Education may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal; they receive training in managing allegations for this purpose.

20.4 Recruitment – interview panels:

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

See appendix 2 of this policy for more information about our safer recruitment procedures

20.5 Staff who have contact with learners and families

Staff who have contact with learners 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.

21. MONITORING ARRANGEMENTS

This policy will be reviewed annually by the Education Leadership Team. At every review, it will be approved by the full governance board.

22. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

This policy links to the following policies and procedures:

- STEP Policy
- Staff code of conduct
- Complaints and Appeals
- Health and safety
- Attendance Policy
- E-Safety (includes acceptable usage
- Online Safety Policy
- Mobile Phone Policy
- Equality and Diversity
- Relationship and Sex Education (RSE)
- First aid
- Curriculum
- Whistle blowing
- Anti-bullying
- Data Protection (GDPR)
- NEAS employee privacy notice
- Designated Teacher Policy
- Unexplained Injuries Policy
- Recruitment Policy
- Medication Policy
- Continual and Professional Development Policy
- Photographs and Digital Imaging Policy
- Transport Policy
- Annual Safeguarding Report

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

APPENDIX 1: TYPES OF ABUSE

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

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

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

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

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

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

Emotional abuse may involve:

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

Sexual abuse involves forcing, causing or inciting 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual

images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse can take place online, and technology can be used to facilitate offline abuse

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
Children are more likely to know their abuser than not, and under 13's can never legally consent to sexual activity.

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 caregivers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

APPENDIX 2: SAFER RECRUITMENT AND DBS CHECKS – POLICY AND PROCEDURES

Recruitment and Selection Process:

The recruitment steps outlined below are based on part three of Keeping Children Safe in Education Part 3.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children

Advertising:

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms:

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting:

Our shortlisting process will involve at least two people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
  - If they are known to the policy and children's local authority social care and
  - If they have been disqualified from providing childcare
  - Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history:

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references ('To whom it may concern')
- Not rely on applicants to obtain their reference
- (In instances of EYFS offer in school, Not accept references from a family member)
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by

the headteacher/principal as accurate in respect to disciplinary investigations

- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children (for EYFS, must be training or education provider)
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection:

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks:

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff:

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.
When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate

- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Management positions are most likely to include, but are not limited to, principals and vice principals.
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff, Volunteers ot trainee teachers:

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff:

- We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will

also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors:

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers:

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers:

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without

barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

- For instances where school has an EYFS offer, we will obtain references for volunteers before they are recruited.
- EYFS volunteers will also not be permitted until school have receive an enhanced DBS certificate including barred list information
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governance:

- All governance will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- The chair of the board will have their DBS check countersigned by the secretary of state.

All trustees will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings:

Where we place a learner with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise learners on work experience:

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a learner under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Learners staying with host families:

Where the school makes arrangements for learners to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit

APPENDIX 3 – ALLEGATIONS OF ABUSE MADE AGAINST STAFF

All allegations will be investigated thoroughly and as a matter of urgency. They will be dealt with quickly, fairly and consistently.

We will always ensure that the procedures outlined in the local authority arrangements for managing allegations and Part 4 of *'Keeping Children Safe in Education'*, DfE are adhered to and where appropriate, we will seek advice from the LADO.

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in school would apply when staff (including volunteers and supply staff) have (or alleged to have):

- 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 he or she 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.

The last bullet point includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate, an assessment of transferable risk to children with whom the person works will be undertaken. If in doubt we will seek advice from the LADO.

When an allegation is made against an adult that meets the above criteria it should be reported immediately to the Principal who is the 'case manager'. This includes allegations made against agency and supply staff, volunteers and contractors.

Staff must:

1. Make a verbal report as soon as possible.
2. Complete the Staff Allegation/Concern Reporting Form (Appendix 3) immediately after the verbal report.
3. Submit the completed form to the Principal (or alternative contact, as outlined below).

The Staff Allegation/Concern Reporting Form is a mandatory record that will:

- Form part of the investigation file.
- Remain attached to all related management and investigation documents.
- Be stored securely in accordance with data protection and safeguarding requirements.

If the allegation or concern relates to the Principal, it must be reported directly to the Director of Education alongside the submission of the Staff Allegation/Concern Reporting Form.

In the event that neither the Principal nor the Director of Education is contactable on that day, the information and form must be passed to and dealt with by:

- The acting Principal; or
- The Deputy Designated Safeguarding Lead; or
- The Chief Executive Officer; or
- The LADO.

If an allegation is made against a trustee, the Principal, in conjunction with the Director of Education and CEO will follow local authority arrangements for managing allegations, liaising with the LADO. Ensuring that at all times.

In the event of an allegation that meets the criteria above, the Principal (or Director of Education/Chief Executive Officer where the Principal is the subject of the allegation) – the 'case manager' – will take the following steps:

- The case manager will conduct basic enquiries in line with local procedures and KCSIE to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
- The case manager will immediately discuss with the LADO, the nature, content and context of the allegation and agree on a course of action. Where the case manager deems there to be an immediate risk to children or a criminal offence has been committed, the police will be contacted immediately. All discussions agreed actions and communications will be recorded

in writing using the Staff Allegation/Concern Reporting Form. The LADO should be informed within one day of any allegations made to the case manager and any actions taken.

- If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened. Cases of suspected abuse will be referred to children's social care.
- Where the police are involved, the case manager 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.
- The case manager will ensure that the individual who is subject to the allegation is informed as soon as possible explaining the likely course of action guided by the LADO, and the police where necessary. The case manager/HR will appoint a named representative to keep the person informed about the progress of the case and consider any appropriate support. The individual is also advised they can contact their trade union representative.
- The case manager will ensure that the parents of the child or children involved are formally told about the allegation as soon as possible and kept informed of the progress of the case, only in relation to their child. They will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- The case manager will monitor the progress of the case to ensure that it is dealt with as quickly as possible in a thorough and fair process.
- Careful consideration will be given to whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious it might be grounds for dismissal. The case manager will maintain contact with the CEO and seek views from HR and the LADO, as well as the police and children's social care where they have been involved. Where an individual is suspended they will be provided with a named contact, their contact details and written confirmation of their suspension.
- If the initial discussion leads to no further action, the case manager and the LADO will record the decision and justification for it and agree on what information should be put in writing to the individual concerned 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 local authority 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)
- The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the school ceases to use their services, or resigns or otherwise ceases to provide their services.
- The school has a legal obligation to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person poses a risk to a child.
- In the case of a member of teaching staff, the case manager must consider making a referral to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.
- Early years only We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

The completed Staff Allegation/Concern Reporting Form, along with any other evidence related to the allegation or concern, will be used to support the initial assessment and inform any referral to the LADO, police, or other relevant external agencies.

All decisions, actions, and outcomes will be documented in the leadership and management section of the form. This record will be stored securely and will be retained within the staff member's personnel file maintained by HR. Access to this information will be strictly limited in line with GDPR procedures and safeguarding.

If the concern arises from a disclosure or allegation made by a learner, all related records — including the Staff Allegation/Concern Reporting Form, actions taken, correspondence, and follow-up — will be stored securely on CPOMS, in line with safeguarding and confidentiality procedures.

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 the 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 it 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 have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Society.

If in doubt, the case manager will seek views from the school's human resource team, Director of Education, CEO 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 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

Additional considerations for supply teachers, trainee teachers and all contracted staff:

If there are concerns or an allegation is made against someone not directly employed by the school, such as 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 make a decision to cease using an individual's services solely on the basis of a safeguarding concern without first establishing the relevant facts and consulting with the LADO to determine an appropriate and fair outcome.

- The school leadership team will work in consultation with the agency to determine whether it is appropriate to suspend the individual or redeploy them to another role within the school while the investigation is ongoing.
- The school will take the lead in gathering all necessary information, while ensuring the agency is fully involved in the process. Relevant details will be provided to the LADO as required.
- The school will address matters relating to information sharing to ensure that any previous concerns or allegations known to the agency are considered. This may be done during the allegations management meeting or through direct liaison with the agency, as appropriate.

Timescales:

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

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

However, these are objectives only and where they are not met, we will endeavour to take the right 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 case manager and the school's HR adviser will discuss with the designated officer whether to 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.

Employer references will include substantiated allegations, provided that the information is factual and does not include opinions.

On conclusion of a case in which the allegation is substantiated, the case manager and the LADO will review the case to determine whether there are any improvements to be made to the school's procedures or practices to help prevent similar events in the future.

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.

If an allegation is shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate or whether the police should be asked to consider action against an adult.

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. For all other allegations a written record of details of the investigation and the outcome will be retained in the individual's personnel file in line with KCSIE and a copy provided to the individual.

Allegations proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references.

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 local authority's designated officer, 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. These records will be stored securely and retained within the staff member's personnel file maintained by HR. Access to this information will be strictly limited in line with GDPR procedures and safeguarding requirements.

If the concern arises from a disclosure or allegation made by a learner, all related records — including the Staff Allegation/Concern Reporting Form, actions taken, correspondence, and follow-up — will be stored securely on CPOMS, in line with safeguarding and confidentiality procedures.

The records of any allegations that, following an investigation is found to be malicious or false will be deleted from the individuals 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 for 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, and decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the case manager 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.

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. Non-recent allegations of abuse should be reported to the LADO who will liaise with other agencies. Allegations against a teacher who is no longer teaching should be referred to the police. 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.

Low-level concerns:

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

All concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) will be dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the criteria indicated in the allegations section above.
A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt.

An adult working in or on behalf of the school may have acted in a way that does not meet the expectation in the staff code of conduct, including conduct outside of school and does not meet the allegations criteria or is not considered serious enough to refer to the LADO.

Such behaviour can exist on a wide spectrum; examples could include, but are not limited to:

- Being overfriendly 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 learners
- Using inappropriate sexualised, intimidating or offensive language towards or in front of a child

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

Low-level concerns about a member of staff should be reported immediately to the DSL (Principal). Where the concern is about the Principal, it should be reported to the Director of Education and recorded using the Staff Allegation/Concern Reporting Form (Appendix 3).

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

Low-level concerns about a supply teacher or contractor should be reported as above. The Principal will notify the employer so that any patterns of inappropriate behaviour can be identified.

All low-level concerns will be recorded by the DSL/Principal using the staff allegation/concern reporting form and stored securely and confidentially. All decisions, actions, and outcomes will be documented in the Leadership and Management section of the form. This record will be stored securely and will be retained within the staff member's personnel file maintained by HR. Access to this information will be strictly limited in line with GDPR procedures and safeguarding requirements.

These records will be reviewed so that any patterns of inappropriate behaviour can be identified and dealt with.

north east autism society

APPENDIX 3: Staff Concern/Allegation Reporting Form.

Staff Concern/Allegation Reporting Form – Guidance & Instructions

Purpose of This Document

This document is designed to help staff record and report any concerns, allegations, or suspicions about the conduct of a school staff member. It forms part of the school's safeguarding, whistleblowing and staff code of conduct procedures, ensuring that all concerns are handled promptly, confidentially, and in line with statutory requirements.

When to Use This Form

It is critical that in the first instance, concerns are immediately raised verbally with the appropriate safeguarding lead.

Following a verbal report, this form must be completed and submitted without delay when:

- You have a safeguarding concern involving a staff member.
- You have witnessed or been informed of alleged misconduct, breach of school policies, or inappropriate behaviour by a staff member.
- You have a whistleblowing concern relating to school operations or staff conduct.
- A child has made an allegation against a member of staff.

Important note – If, at any stage, you believe a child is in immediate danger or at risk of serious harm you must:

- Contact the Designated Safeguarding Lead (DSL) immediately.
- If the DSL is unavailable, contact a Deputy DSL or emergency services (999).
- You must still complete this form, but do not delay immediate safeguarding action.

Reporting Routes

- If the allegation or concern is about a staff member of the school, the principal must be verbally informed immediately. Thereafter, submit this form directly to them, without delay.
- If the allegation or concern is about the Principal, the Director of Education must be contacted immediately. Thereafter, submit this form directly to them, without delay.
- Our Designated Trustee for safeguarding is Rakesh Chopra.

Important Contacts

- Principal and DSL: helen.mitchell-principal@ne-as.org.uk
- Director of Education: tracey.train@ne-as.org.uk
- Designated Trustee: rakesh.chopra@ne-as.org.uk
- LADO Contact: designatedofficer@togetherforchildren.org.uk
- HR Contact: hr@ne-as.org.uk
- COO: Jessica.greer@ne-as.org.uk
- CEO: paul.McGinnety@ne-as.org.uk

Additional Guidance

- Keep your report factual, avoiding assumptions or personal opinions.
- Provide as much information as you can, including attaching any evidence you may have (emails, screenshots, witness names).
- If you are uncertain whether a concern warrants reporting, please follow usual procedure by making a verbal report and submitting this form. The designated staff member will determine whether further action is necessary. You will receive an email acknowledgement of your report.
- Please be assured that all concerns will be treated confidentially in line with GDPR.
- All staff have a professional and legal duty to report any concerns in the best interests of learners and colleagues, in accordance with the school's safeguarding policies and procedures. Failure to follow this guidance may result in disciplinary action in line with the Staff Code of Conduct.

Concern/Allegation Reporting Form

Reporting staff members details	
Full Name	
Job Title	
Date of Report	

Staff Member(s) Details for who the concern/allegation relates to	
Full Name	
Job Title	

Nature of Concern/Allegation

- ☐ Professional Misconduct
- ☐ Breach of school policies and procedures
- ☐ Safeguarding
- ☐ Other (please specify) _____

Details of Concern/Incident	
Date	
Time	
Location	
Was there CCTV in the area?	
Learner name (If applicable)	
Full names of witnesses (if any)	
Any further evidence provided?	

Please provide a detailed, factual account of the allegation/concern.

Recording of Incident	
*Please note if an allegation is made by a learner it **must** be recorded on CPOMS*	
Was the incident recorded on CPOMS? If so, please log date	
Was the incident recorded on MACS? If so, please log reference number	
Was a first aid check required? If so, please provide details of findings and any reference numbers	

Who is this form submitted to?
☐ Principal
☐ Director of Education
☐ Other (please specify) _____

Signature	
I confirm that the information provided is accurate to the best of my knowledge and understand that this report will be handled according to the societies policies and procedures.	
Signature	
Date	

FOR LEADERSHIP AND MANAGEMENT USE ONLY

Management Action and Investigation Record - To remain attached to Original Concern/Allegation Form

Management of allegation/concerns	
(To be completed by the Principal, HR, Director of Education or assigned investigator)	
Date Received	
Form submitted by	
Name of manager who received the form	
Email acknowledgement of receipt of report	Date:
Is the person the concern/allegation is regarding a member of NEAS staff?	Yes/No If no, their employer/agency must be informed and noted below under 'action taken' once complete.
Signature	

Next Steps (if applicable)

- ☐ Assessment of risk
- ☐ Witness statements obtained
- ☐ CCTV footage obtained
- ☐ First aid checks complete
- ☐ Record of incident obtained (*CPOMS, MACS, Accident/Injury Record)*
- ☐ Childs' view/words obtained
- ☐ Parents notified

Action taken

- ☐ Referred to HR
- ☐ Director of Education notified
- ☐ Referred to LADO
- ☐ Any other external authorities (please specify) _____
- ☐ Other: _____

Name of assigned investigator(s) (if applicable)	

FOR LEADERSHIP AND MANAGEMENT USE ONLY

Management Action and Investigation Record – To remain attached to Original Concern/Allegation Form

Investigation Outcome	
(To be completed by the Principal, HR, Director of Education or assigned investigator)	
Summary of Findings:	
Outcome	
Advice and Guidance received by	
☐ HR ☐ Director of Education ☐ LADO ☐ Any other external authorities (please specify) _____ ☐ Other: _____	
Actions	
Date Closed	
Name and signature	

APPENDIX 4 – SPECIFIC SAFEGUARDING ISSUES

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

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

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

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children missing from education:

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

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

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

For full details about our school's policies in this areas, please refer to our Attendance Policy

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect,

including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
Should school have an EYFS offer, if a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.
We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged. Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

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

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

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 of 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 organized abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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 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 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. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

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. . Most sexual abuse is committed by individuals known to the victim.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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.
Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, which 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)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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 or AI generated content 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)
- Any discriminatory behaviour, including racism and faith targeted abuse

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

Children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice based harm.

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

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.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. 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. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

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

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 deputies will be aware of contact details and referral routes into 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. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

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 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 learner is at risk of FGM.

Indicators that FGM has already occurred include:

- A learner confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/learner 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 learner 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 stating that either 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 one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. 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 'one chance' rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them.

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

- Speak to the learner 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 fmu@fco.gov.uk
- Refer the learner 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 the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

- 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 of 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 learners 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 learners' behaviour.

The government website Educate Against Hate and charity NSPCC says that signs that a learner 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 X or other social media
- 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 learner, 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, including:

- Prevent Strategy
- Prevent risk assessment
- E-safety policy

- External speaker's policy
- Curriculum policy

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

- Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)
- Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

Harmful Sexual Behaviour 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)
- HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.
- Children who are victims of HSB, 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 sexual violence or sexual harassment. 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
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse
- 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

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

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 accompanied at all times.

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

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

Non-collection of children:

If a child is not collected at the end of the session/day, we will follow the school's Non-Collection of Learner Procedure.

Missing learners:

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 follow the school's Missing from Education Policy and Procedures