Clifton Green Primary School

Child Protection and Safeguarding Policy

Signature of Co-Chairs of Governors	Kathleen Wood and Jeremy Pilling
Signature of Head Teacher	
Member of staff responsible	Designated Safeguarding Lead
Reviewing Committee	Full Governing Body
Statutory/Non-Statutory	Statutory
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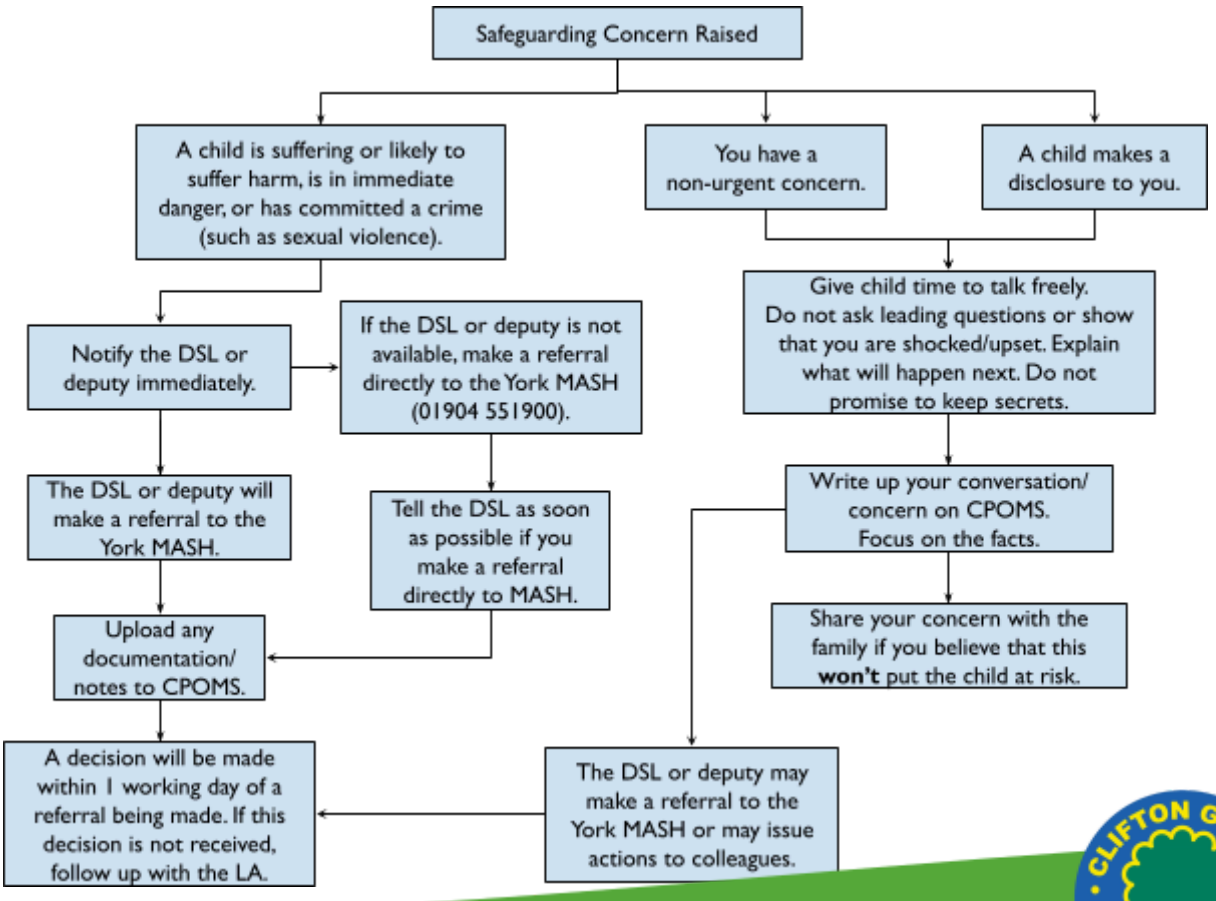
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In order to support all staff in finding important information with ease, the first page of this document outlines key contacts and the 'taking action' flowchart. These pages should be kept by all staff/governors/volunteers for quick-reference.

1. Key Contacts

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Jenny Smith	j.smith@cliftongreenprimary.co.uk 01904 936948
Deputy DSL	Kristine Procter	k.procter@cliftongreenprimary.co.uk 01904 936948
Deputy DSL	Paul Prest	p.prest@cliftongreenprimary.co.uk 01904 936948
Co-Chairs of Governors	Kath Wood Jeremy Pilling	k.wood@cliftongreenprimary.co.uk 01904 936948 j.pilling@cliftongreenprimary.co.uk 01904 936948
Safeguarding Governor	Kath Wood	k.wood@cliftongreenprimary.co.uk 01904 936948
CYC Safeguarding Advisor	Gaynor Stainsby	Gaynor.Stainsby@york.gov.uk 075354822596
Local Area Designated Officer (LADO)		lado@york.gov.uk 01904 551783
CYC Multi-Agency Safeguarding Hub (MASH)		MASH@york.gov.uk 01904 551900
Report Extremism in Education DfE Channel/Prevent Helpline		https://report-extremism.education.gov.uk/ to report counter.extremism@education.gov.uk 020 7340 7264

2. Quick-Reference 'Taking Action' Flowchart



N.B. York MASH Threshold Documents and Referral Forms can be found here: https://www.saferchildrenyork.org.uk/cyscp-1/report-concern-child-young-person

3. Aims

3.1. Clifton Green Primary School is committed to safeguarding and promoting the welfare, both physical and emotional, of children and young people both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

3.2. The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Children are taught how to keep safe and recognise behaviour that is unacceptable
- Any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

4. Definitions

4.1. **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.

4.2. **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 outside the home, including online.

4.3. **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.

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

4.5. **Sharing of nudes and semi-nudes(inc. AI-generated/manipulated intimate images and deepfakes).** Sharing of nude or semi-nude/intimate images includes consensual and non-consensual sharing of self-generated intimate images, including images generated or manipulated using AI (for example, deepfakes), videos or live streams.

4.6. **Children** include everyone under the age of 18.

4.7. 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.

4.8. **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.

4.9. **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.

5. Equality statement

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

5.2. We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 12)
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing from education 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.

6. Roles and responsibilities

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

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

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

6.3. All staff are expected to read Part One of Keeping Children Safe in Education (KCSIE) 2026 in full and follow the school's safeguarding policies and procedures.This

will be shared via The National College which will record that each staff member has read the document.

6.4. All staff will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

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

6.6. All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, the Behaviour Policy, the Online Safety Policy (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and the safeguarding response to children who go missing from education
- The community-based Early Help and Family Help arrangements in the local area, and their role in identifying children and families who may benefit from help and support, liaising with the DSL and working with other professionals.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, 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 their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection.
- **Section 17 and Appendix 4 of this policy outline in more detail how staff are supported to do the above.**

6.7. **The Designated Safeguarding Lead (DSL)**

- The DSL is a member of the senior leadership team. **Our DSL is Jenny Smith, Deputy Headteacher.**
- The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- During term time, the DSL will be available during school hours to discuss any safeguarding concerns. Out of school hours, our DSL can be contacted via email/phone.
- When the DSL is absent, the deputy DSL team , Kristine Procter (Pastoral and Mental Health Lead) and Paul Prest (Headteacher), will act as cover.
- All staff can also call the York Multi-Agency Safeguarding Hub (MASH) (01904 551900) for advice about Safeguarding and Child Protection should they need it.
- The DSL will be given the time, funding, training, resources and support to:
    - Provide advice and support to other staff on child welfare and child protection matters
    - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
    - Contribute to the assessment of children
    - Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
    - Have a good understanding of harmful sexual behaviour
    - Have a good understanding of the filtering and monitoring systems and processes in place at our school

- The DSL is also the Prevent Lead and will make sure that staff have appropriate Prevent training and induction.

- 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.

6.8. The governing board 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 headteacher to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see Appendix 3).
- **All governors will read Keeping Children Safe in Education in its entirety.**
- Section 18 of this policy has information on how governors are supported to fulfil their role.

6.9. The Headteacher

- The headteacher is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers 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 updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the Chair of Governors/Safeguarding Link Governor on this
- Ensuring 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 and devices like mobile phones and cameras in the setting.

6.10. Virtual School Head

- The Virtual School Head has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.
- Virtual School Heads also 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 co-ordinators (SENCOs), social workers, mental health leads and others.

7. Confidentiality

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

7.2. Timely information sharing is essential to effective safeguarding.

7.3. 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.

7.4. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

7.5. 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.

7.6. 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.

7.7. 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.

7.8. 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

7.9. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (necessary, proportionate, relevant, adequate, accurate, timely and secure) and will support staff who have to make decisions about sharing information.

7.10. If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy).

8. Recognising abuse and taking action

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

8.2. All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to potential need for help, support or protection, including community-based Early Help or Family Help where appropriate:

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

- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

8.3. If a child is suffering or likely to suffer harm, in immediate danger, or has committed a crime (such as sexual violence):

- Notify the DSL or deputy immediately who will make a referral to children's social care (York Multi-Agency Safeguarding Hub (MASH) - 01904 551900)) and/or the police (via 999 if necessary) as quickly as possible.
- York MASH Threshold Documents and Referral Forms can be found here: https://www.saferchildrenyork.org.uk/concerned-about-a-child-or-young-person.htm
- If a DSL or deputy is not available, make a referral directly to the York MASH using the details above. Anyone can make a referral. **Tell the DSL (see section 6.5) as soon as possible if you make a referral directly** and upload any documentation/notes to CPOMS.
- The Local Authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

8.4. If a child makes a disclosure to you or you have a non-urgent concern you should:

- Follow our 5 R's and TED approach for support (Annex 5)
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Pass any concerns to the DSL or deputy DSL via CPOMS.
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.2), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- Bear in mind that some children may:
    - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
    - Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

8.5. If you discover that FGM has taken place or a pupil is at risk of FGM:

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

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

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

- Any <u>teacher</u> who either:

  - Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

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

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

- Any member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 or who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out, must speak to the DSL and follow our local safeguarding procedures (see section 8.3 above).

8.6. If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or deputy and/or recording the concern on the school's CPOMS Software.

8.7. Staff must provide as much detail as possible and if necessary a body map if there are any marks/injuries on the child. It is important that only objective observations and facts are recorded and staff must include their reasons for the concern, what was said or witnessed and dates and times of incidents.

8.8. Any physical records should be attached to CPOMS logs and then destroyed. Such records form evidence and may be used in the child protection investigation and any subsequent legal proceedings.

8.9. Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and Deputy DSLs, will always consider the context of incidents – this is known as **contextual safeguarding**. Assessment and understanding of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Also if they are suffering harm or have been traumatised by abuse. The school will provide as much contextual information as possible when making referrals to York MASH.

8.10. Once Safeguarding concerns and actions/information are recorded on CPOMS, an alert automatically goes to the Designated Safeguarding Lead and Deputy DSL's. They will then decide whether to make a formal referral to the York Multi-Agency Safeguarding Hub.

8.11. When the DSL makes a formal referral to the York Multi-Agency Safeguarding Hub, they will follow the City of York Safeguarding Children Board Child Protection Procedures (CYSCB) by:

- Gathering as much information as possible (e.g. attendance, behaviour, how the children present in school and the reason for the referral).
- Speaking to parents/carers as good child protection practice rests within a climate of openness and honesty. Parents/carers will in general and where possible be spoken to unless to do so may place the child at risk of significant harm, impede any police investigation or place the member of staff or others at risk. An inability to contact parents will not cause undue delay in making a referral. The DSL will not fail to make any necessary child protection referral if the parents disagree with this decision. The DSL will make it clear that they are following the City of York Safeguarding Children Board Child Protection Procedures (CYSCB).
- Calling the Multi-Agency Safeguarding Hub (M.A.S.H.) on 01904 551900 (Emergency Duty Team 01609 780780) and followed up the phone call with an email to MASH@york.gov.uk **sharing the completed referral form within 24 hours.**
- Logging on to the school's CPOMS system and attaching the referral form.
- The DSL is entitled to make an enquiry as to whether the child is on, or has been on, the Child Protection Register.

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

8.13. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

8.14. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm.

8.15. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Early Help and pastoral support.

8.16. Early Help and Family Help:

- If Early Help is appropriate, the Deputy DSL/Pastoral Lead will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help Assessment, in some cases acting as the lead practitioner.
- Where it is felt the family needs can be supported at an Early Help level, schools can seek support from the Early Help Consultants on email: earlyhelpconsultants@york.gov.uk Early Help Consultants can provide advice and support to lead workers regarding Early Help Assessments, processes and suitable interventions.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. The 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.

8.17. 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 CYC MASH 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,

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 referral form: https://report-extremism.education.gov.uk/ and a telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
    - Think someone is in immediate danger
    - Think someone may be planning to travel to join an extremist group
    - See or hear something that may be terrorist-related

8.18. If you have a mental health concern:

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.3.
- If you have a mental health concern that is not also a safeguarding concern, speak to Kristine Procter (Pastoral Lead and Senior Mental Health Lead).
- You might find it useful to refer to the DfE's recommended resources for supporting Mental Health in schools: https://educationhub.blog.gov.uk/2021/09/03/mental-health-resources-for-children-parents-carers-and-school-staff

8.19. Concerns about a staff member, supply teacher, volunteer or contractor:

- If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, **speak to the headteacher or DSL as soon as possible**.
- If the concerns/allegations are about the headteacher, speak to the co chairs of governors (Kathleen Wood k.wood@cliftongreenprimary.co.uk)and (Jeremy Pilling j.pilling@cliftongreenprimary.co.uk)

- The headteacher/chair of governors 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 headteacher, report it directly to the local authority designated officer (LADO).
- If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.
- Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

8.20. Allegations of Child-on-child abuse (including harassment and violence):

- We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.
- We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
- Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
    - Is serious, and potentially a criminal offence
    - Could put pupils in the school at risk
    - Is violent
    - Involves pupils being forced to use drugs or alcohol
    - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes(inc. AI-generated/manipulated intimate images and deepfakes).)

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

8.21. Procedures for dealing with allegations of Child-on-child abuse (including harassment and violence):

- If a pupil makes an allegation of abuse against another pupil:
  - You must record the allegation and tell the DSL, but do not investigate it
  - The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
  - The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
  - 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.

8.22. **Creating a supportive environment in school and minimising the risk of Child-on-child abuse (including harassment and violence)**:

- We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
- To achieve this, we will:
  - Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
  - Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
  - Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
  - Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 8.23 below)

- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that my point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - children can show signs or act in ways they hope adults will notice and react to
        - a friend may make a report
        - a member of staff may overhear a conversation
        - a child's behaviour might indicate that something is wrong.
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

- The DSL will take the lead role as investigator of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

8.23. Sharing of nudes and semi-nudes(inc. AI-generated/manipulated intimate images and deepfakes). Further information can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings__Web_accessible_.pdf

- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, you must report it to the DSL immediately.
- You must **not**:
  - View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
  - Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involve
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
  - Whether there is an immediate risk to pupil(s)
  - If a referral needs to be made to the police and/or children's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
  - Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the pupils involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
  - The incident involves an adult

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

- If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.
- If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the pupils involved (if appropriate).
- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.
- The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.
- If it is necessary to refer an incident to the police, this will be done either via dialling 999/101 depending on the severity/urgency of the case or by contacting Laura Harper, School Liaison Officer (laura.harper@northyorkshire.police.uk
- All incidents of sharing of nudes and semi-nudes(inc. AI-generated/manipulated intimate images and deepfakes) 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.
- Older pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education. Te

covers the following in relation to the sharing of nudes and semi-nudes(inc. AI-generated/manipulated intimate images and deepfakes).

- What it is
    - How it is most likely to be encountered
    - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
    - Issues of legality
    - The risk of damage to people's feelings and reputation
    - Pupils also learn the strategies and skills needed to manage:
        - Specific requests or pressure to provide (or forward) such images
        - The receipt of such images.

8.24. Reporting systems for our pupils

- Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
    - Put systems in place for pupils to confidently report abuse
    - Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
    - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
    - Our RSE curriculum and PSHE Jigsaw curriculum provides children with age-appropriate advice and education regarding keeping themselves safe.
    - BigTalk will be used annually to educate children in an age-appropriate way about sex and puberty

9. Online safety and the use of mobile technology

9.1. 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.

9.2. To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

  We will do this as part of PSHE and Computing sessions as well as through awareness raising days, such as Safer Internet Day and through cross-curricular links and assemblies.

We will refer to the resources created by the UK Council for Internet Safety, 'Education for a Connected World', to ensure that children receive age-appropriate education regarding this topic.

- 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.

- The school recognises that generative AI can create additional safeguarding risks, including the creation or manipulation of sexualised or otherwise harmful content, deepfakes, impersonation and inappropriate or unsafe interactions. These risks will be considered as part of the school's online safety arrangements.

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

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

    - Staff are allowed to bring their personal phones to school for their own and professional use, but will limit such use as much as possible to non-contact time when pupils are not present

    - Staff are to avoid taking pictures or recordings of pupils on their personal phones or cameras

    - Mobile phones will be safely stored and in silent mode whilst pupils are present in lessons

    - Staff will use their professional judgement in emergency situations

    - Staff may take mobile phones on educational visits, but they must only be used to take photographs for posting on official social media, or in the event of an emergency. Images or videos of pupils or staff taken on mobile phones on educational visits for the purpose of posting on social media will be deleted immediately afterwards.

    - Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy.Where photographs and videos will involve LAC pupils, adopted pupils, or pupils for whom there are security concerns, the DSL will determine the steps involved. The DSL will, in known cases of a pupil who is a LAC or who has bee

adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.

- Staff will report any concerns about another staff member's use of mobile phones by following the guidance set out in Appendix 3.

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

9.5. Artificial intelligence (AI)

- Generative artificial intelligence (AI) tools are increasingly widespread and accessible to staff, pupils and parents/carers. Clifton Green recognises that AI can have beneficial uses within education, including supporting teaching and learning. However, the use of AI also presents safeguarding, online safety, data protection and privacy risks.
- AI may be used to facilitate abuse or harm, including bullying, harassment, grooming, exploitation, fraud and the creation or manipulation of harmful or sexualised content. This includes 'deepfakes' and other AI-generated or AI-manipulated images, audio and video. AI may also be used to create or manipulate child sexual abuse material.

- Any safeguarding concern involving AI will be responded to in accordance with this Child Protection Policy and, where relevant, the school's Behaviour Policy and Online Safety Policy. Staff should report safeguarding concerns involving AI to the Designated Safeguarding Lead (DSL) or a deputy in the same way as any other safeguarding concern.

- The school will consider the safeguarding implications of generative AI as part of its filtering and monitoring arrangements, including the potential for pupils to access harmful, inappropriate or AI-generated content.

- The use of generative AI within school must be appropriately assessed and authorised. Staff must follow the school's agreed procedures for the use of AI tools, including requirements relating to data protection, privacy and information security. Personal or sensitive information about pupils must not be entered into generative AI tools unless their use for this purpose has been appropriately approved and complies with the school's data protection arrangements.

- Where pupils use generative AI as part of their education, the school will consider appropriate safeguards, including the age restrictions of individual services, supervision, filtering and monitoring, and the suitability of the tool for the pupils concerned.

- The school will have regard to Department for Education guidance on the safe and effective use of generative AI in education and the DfE's Generative AI Product Safety Standards.

10. Notifying parents or carers

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

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

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

10.4. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

10.5. 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. Work experience and apprentices

11.1. Where the school has young people conducting work experience at the school or following apprenticeship training, an enhanced DBS check will be obtained if the individual is over the age of 16.

11.2. Staff are reminded that the guidance within this policy should also be applied to any volunteers, staff and trainees under the age of 18. Staff members must ensure that these individuals are not subject to any harm, inappropriate materials or adult conversations. They must also raise any concerns about the young person's safety and wellbeing using the routes shared in section 8.

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

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges

- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so.

12.2. We offer extra pastoral support for these pupils. This includes:

- Any additional 1:1 support or small group work as necessary

- Direct contact and relationship building with year group teams and the inclusion team, especially the Inclusion Lead
- Regular ELSA interventions targeted to support those in need
- Alternative communication methods e.g. drawing, use of Communication in Print etc.
- Access to a sensory space as necessary to calm and soothe individuals.

13. Pupils with a social worker

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

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

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

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

14. Looked-after and previously looked-after children

14.1. 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, Karen Banks, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

14.2. As part of their role, the designated teacher will:

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

15. Children who are questioning their gender

15.1. The school will have regard to the statutory guidance in Keeping Children Safe in Education (KCSIE) 2026 when supporting children who are questioning their gender. The school will take a safeguarding-led, child-centred approach, considering the individual circumstances and best interests of the child, appropriate parental involvement, any relevant clinical advice, and the school's duties under the Equality Act 2010 and Human Rights Act 1998.

16. Complaints and concerns about school safeguarding policies

16.1. 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)

16.2. Full details of our school complaints procedure can be found on our website: https://www.cliftongreenprimary.co.uk/our-school/policies-complaints/

17. Whistleblowing

17.1. If any staff, governors or volunteers have any concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures – they should follow the school's Whistleblowing Policy (found on the Clifton Green Policy Drive).

17.2. If a staff member feels unable to raise an issue with the School Leadership Team or Governors, they should access other whistleblowing channels such as the Local Authority or the NSPCC whistleblowing helpline (0800 028 0285).

18. Record-keeping

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

18.2. 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.

18.3. Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- actions taken, decisions made, the rationale for those decisions and outcomes.

18.4. Concerns and referrals will be kept in a separate online child protection record for each child.

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

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

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

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

18.8. 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 act in the best way to meet the needs of the child and continue to effectively provide safeguarding and child protection.

18.9. Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment check.

18.10. Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

19. Training

19.1. All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure the

understand the school's safeguarding systems and their responsibilities and that they can identify signs of possible abuse or neglect.

19.2. This training will be regularly updated and will:

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

19.3. 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. Updates to their initial induction training will be shared annually.

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

19.5. Volunteers will receive appropriate training, if applicable.

19.6. The DSL and deputies will undertake child protection and safeguarding training at least every 3 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) They will also undertake Prevent awareness training.

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

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

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

20. Safer Recruitment and interview panels

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

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

20.2. The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

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

20.4. See Appendix 2 of this policy for more information about our safer recruitment procedures.

21. Sports clubs and extra-curricular activities

21.1. Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

21.2. Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguard- ing responsibilities and promote the welfare of pupils.

21.3. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to the DSL, CSCS or the police, if necessary.

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

22. Legislation and Statutory Guidance

22.1. This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Maintained Schools Governance Guide.

22.2. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners at the City of York Safeguarding Children's Partnership.

22.3. This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment

victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- 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 for the Early Years Foundation Stage.

23. Monitoring arrangements

23.1. This policy will be reviewed annually by Paul Prest, Headteacher and Jenny Smith, Deputy Headteacher and DSL. At every review, it will be approved by the full governing board.

24. Links with other policies

24.1. This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Relationships and Sex Education
- First Aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices

- Whistle-blowing

N.B. The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

- Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Pupils can be at risk of abuse or exploitation in situations outside their families.
- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve:
    - Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
    - Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
    - Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
    - Seeing or hearing the ill-treatment of another
    - Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
    - Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
    - Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet.

- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
- Once a child is born, neglect may involve a parent or carer failing to:
    - Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
    - Protect a child from physical and emotional harm or danger
    - Ensure adequate supervision (including the use of inadequate care-givers)
    - Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

- The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.
- 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:
    - 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.
    - City of York Council 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,
    - Our shortlisting process will involve at least 2 people and will:
        - Consider any inconsistencies and look for gaps in employment and reasons given for them
        - Explore all potential concern
    - 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 Wale
    - Any relevant overseas information
    - Sign a declaration confirming the information they have provided is true
- We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Candidates will be informed that we may carry out these checks as part of our due diligence process.
- This will normally comprise a current name and previous name search on Google. Any aspects of concern will be shared with the Chair of the panel/Headteacher and a decision made regarding proceeding with the interview and addressing the concern at interview.
- We will obtain references before interview for use by Headteacher/Chair of Panel in decision making. 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
    - 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
- 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.

- 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

- 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.
- 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:
    - 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 they have 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 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 above, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.
- Volunteers:
  - We will:
    - From 1 September 2026 the supervision exemption has been removed. A volunteer doing relevant activity frequently, on more than 3 days in 30, or overnight is now in regulated activity even if supervised, and needs an enhanced DBS check with children's barred-list information.
    - 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.

- 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.

- Governors:
  - All governors 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.
  - All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).
- Staff working in alternative provision settings:
  - Where we place a pupil 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 pupils 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 pupil 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.

Appendix 3: Allegations of abuse against staff (including low-level concerns)

Section 1: allegations that may meet the harms threshold

- This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.
- This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:
    - Behaved in a way that has harmed a child, or may have harmed a child, and/or
    - Possibly committed a criminal offence against or related to a child, and/or
    - Behaved towards a child or children in a way that indicates 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 – this includes behaviour taking place both inside and outside of school
- If we're in any doubt as to whether a concern meets the harm threshold, we will consult our Local Authority Designated Officer (LADO).
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
- Our procedures for dealing with allegations will be applied with common sense and judgement.
- If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.
- Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

- Based on an assessment of risk, we will consider alternatives such as:
    - Redeployment within the school so that the individual does not have direct contact with the child or children concerned
    - Providing an assistant to be present when the individual has contact with children
    - Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
    - Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
    - Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Local Authority.
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.
- Definitions for outcomes of allegation investigations:
    - Substantiated: there is sufficient evidence to prove the allegation
    - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
    - False: there is sufficient evidence to disprove the allegation
    - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
    - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- Procedure for dealing with allegations:
    - In the event of an allegation that meets the criteria above, the case manager will take the following steps:
        - Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.

- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and

by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

- Additional considerations for supply teachers and all contracted staff:
    - If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.
    - We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
    - The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
    - We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
    - We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).
    - When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.
- Timescales:
    - We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:
        - Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
        - If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
        - If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
    - However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.
- Specific actions:
    - Action following a criminal investigation or prosecution:

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

- Conclusion of a case where the allegation is substantiated:
  - If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
  - If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.
- Individuals returning to work after suspension:
  - If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
  - The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.
- Unsubstantiated, unfounded, false or malicious reports:
  - If a report is:
    - Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
    - Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it
- Unsubstantiated, unfounded, false or malicious allegations:
  - If an allegation is:

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

- Confidentiality and information sharing:
  - The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
  - The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:
    - Who needs to know about the allegation and what information can be shared
    - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
    - What, if any, information can be reasonably given to the wider community to reduce speculation
    - How to manage press interest if, and when, it arises
- Record-keeping:
  - The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
  - The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
  - For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
    - A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference (in these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate).

- References:
  - When providing employer references, we will:
    - Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
    - Include substantiated allegations, provided that the information is factual and does not include opinions
  - Learning lessons
    - After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.
    - This will include consideration of (as applicable):
      - Issues arising from the decision to suspend the member of staff
      - The duration of the suspension
      - Whether or not the suspension was justified
      - The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual
    - For all other cases, the case manager will consider the facts and determine whether any improvements can be made

- Non-recent allegations:
  - Abuse can be reported, no matter how long ago it happened.

- We will report any non-recent allegations made by a child to the LADO in line with our Local Authority's procedures for dealing with non-recent allegations.
- Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

- The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.
- This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
- Concerns may arise through, for example:
  - Suspicion
  - Complaint
  - Disclosure made by a child, parent or other adult within or outside the school
  - Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.
- Definition of low-level concerns:
  - The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:
    - Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
    - Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the Local Authority
    - Examples of such behaviour could include, but are not limited to:
      - Being overly friendly with children
      - Having favourites
      - Taking photographs of children on their mobile phone

- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

- We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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 and using the 'Low Level Concerns Form' included on page 56 of this policy

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

    - 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.

- Responding to low-level concerns:

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

        - Directly to the person who raised the concern, unless it has been raised anonymously

        - To the individual involved and any witnesses.

    - If the concern is regarding the Headteacher, it should be shared with the Chair of Governors.

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

- Where there is any doubt whatsoever, advice will be sought from the Local Authority Designated Officer on a no-names basis if necessary.
- Low-level concerns, discussions and any investigation surrounding them will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.
- Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.
- Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.
- Some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher/Chair of Governors should also consider whether this is the case – by referring to the organisation's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary. If the Headteacher/ Principal or Safeguarding Lead considers that the organisation's disciplinary or capability procedure may be triggered, they should refer the matter to HR.
- Records will be:
    - Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
    - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through

our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the school.

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

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

  - The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

  - The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

  - Low level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (please use a separate sheet if necessary). The record should be signed, timed and dated.

Name of staff member (who the low-level concern is regarding):	
Role:	
Details of concern	
Reporting staff member's name:	

Signed:	
Time and Date:	

This record will be held securely in accordance with Clifton Green Primary School's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Clifton Green Primary School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Appendix 4: Specific Safeguarding Issues

- This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B.
- **Assessing adult-involved nude and semi-nude sharing incidents**
    - This section is based on annex A of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.
    - All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.
    - There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.
    - **Clifton Green Primary School: Low-Level Concern Form**
    - Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:
    - • is inconsistent with Clifton Green Primary School's staff code of conduct, including inappropriate conduct outside of work, AND
    - • does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.
    - You should provide a concise record – including brief context in which the low-l

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

- Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.
- Potential signs of adult-involved grooming and coercion can include the child or young person being:
    - Contacted by an online account that they do not know but appears to be another child or young person
    - Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
    - Moved from a public to a private/E2EE platform
    - Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
    - Offered something of value such as money or gaming credits
    - Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

- Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.
- Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.
- Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:
    - Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
    - Use images that have been stolen from the child or young person taken through hacking their account
    - Use digitally manipulated images, including AI-generated images, of the child or young person

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

- **Checking the identity and suitability of visitors**
    - All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
    - 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 in electronically 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:
        - their photo ID and DBS certificate, which will be checked alongside their photo ID; OR
        - the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out
    - All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that

any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

- **Children who are absent from education**
    - A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
    - There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:
        - Are at risk of harm or neglect
        - Are at risk of forced marriage or FGM
        - Come from Gypsy, Roma, or Traveller families
        - Come from the families of service personnel
        - Go missing or run away from home or care
        - Are supervised by the youth justice system
        - Cease to attend a school
        - Come from new migrant families
    - We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the Local Authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the Local Authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
    - Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.
    - If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the Local Authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.
- **Child Criminal Exploitation (CCE)**

- Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- Indicators of CCE can include a child:
  - Appearing with unexplained gifts or new possessions
  - Associating with other young people involved in exploitation
  - Suffering from changes in emotional wellbeing
  - Misusing drugs and alcohol
  - Going missing for periods of time or regularly coming home late
  - Regularly missing school or education
  - Not taking part in education
  - If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

- **Child Sexual Exploitation (CSE)**
  - Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.
  - The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
  - The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand

they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

- CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.
- In addition to the CCE indicators above, indicators of CSE can include a child:
  - Having an older boyfriend or girlfriend
  - Suffering from sexually transmitted infections or becoming pregnant
- If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

- **County Lines**
  - For the purpose of this policy, "County lines" refers to organised criminal networks or gangs exploiting children to move drugs and money into one or more areas (within the UK). Drugs and money may also be stored by children for the purpose of criminal activity.
  - Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.
  - The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.
  - Indicators that a pupil may be involved in county lines active include the following:
    - Persistently going missing or being found out of their usual area
    - Unexplained acquisition of money, clothes or mobile phones
    - Excessive receipt of texts or phone calls
    - Relationships with controlling or older individuals or groups
    - Leaving home without explanation
    - Evidence of physical injury or assault that cannot be explained
    - Carrying weapons

- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

- **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 and child/adolescent to parent violence and abuse. 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.
  - Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.
  - If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day using an Operation Encompass notification. This notification will be shared with relevant staff via CPOMS and the pastoral team will provide support according to the child's needs and update records about their circumstances.
- **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 pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.
  - The DSL will:

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

- **Homelessness**
  - Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
  - The DSL 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..
- **So called 'Honour-based' abuse (HBA) including FGM**
  - 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 8.4 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.
    - Indicators that FGM has already occurred include:
      - A pupil confiding in a professional that FGM has taken place

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

- **Missing pupils**
    - Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:
        - immediately contact the child's parent/carer (or other emergency contacts if there is no answer)
        - immediately contact the police
        - ask a team of staff members to conduct a search of the school grounds and local area.
- **Non-collection of children**
    - If a child is not collected at the end of day:
        - Teaching teams will keep the child with them for 10 minutes after the pick-up time

- If the child has still not been collected, teaching teams will take children to After School Club and contact parents/carers in the order of contacts held on Arbor. This may involve a home-visit by 2 members of staff.
- If contact cannot be made with any of the contacts held on Arbor before 4:30pm, then advice will be sought from the York Multi-Agency Safeguarding Hub.

- Non-collection of children will be monitored for frequency and any patterns. If there are any concerns noted, these will be raised sensitively with the family.
- Persistent non-collection could result in a referral to CSC regarding concerns of neglect.

- **Child-on-child abuse (including harassment and violence)**
  - Child-on-child abuse (including harassment and violence) is when children abuse other children. This type of abuse can take place inside and outside of school and online.
  - Child-on-child abuse (including harassment and violence) 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 peers
    - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
    - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
    - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
    - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
    - Consensual and non-consensual sharing of nudes and semi-nudes(inc. AI-generated/manipulated intimate images and deepfakes) images and/or videos (also known as sexting or youth produced sexual imagery)

        - Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

        - Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

    - If staff have any concerns about Child-on-child abuse (including harassment and violence), or a child makes a report to them, they will follow the procedures set out in section 8.18 and 8.19 of this policy, as appropriate.

- **Preventing radicalisation**

    - **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

    - **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

    - **Terrorism** is an action that:

        - Endangers or causes serious violence to a person/people;

        - Causes serious damage to property; or

        - Seriously interferes or disrupts an electronic system

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

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

    - Staff should always take action if they are worried.

- We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
- We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.
- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
- Staff will be alert to changes in pupils' behaviour.
- The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:
    - Refusal to engage with, or becoming abusive to, peers who are different from themselves
    - Becoming susceptible to conspiracy theories and feelings of persecution
    - Changes in friendship groups and appearance
    - Rejecting activities they used to enjoy
    - Converting to a new religion
    - Isolating themselves from family and friends
    - Talking as if from a scripted speech
    - An unwillingness or inability to discuss their views
    - A sudden disrespectful attitude towards others
    - Increased levels of anger
    - Increased secretiveness, especially around internet use
    - Expressions of sympathy for extremist ideologies and groups, or justification of their actions
    - Accessing extremist material online, including on Facebook or Twitter
    - Possessing extremist literature
    - Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations
- Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

- If staff are concerned about a pupil, they will follow our procedures set out in section 8.14 of this policy, including discussing their concerns with the DSL.
- Staff should **always** take action if they are worried.

- **Pupils with family members in prison**
  - Pupils with a family member in prison will be offered pastoral support as necessary.
  - They will receive a copy of 'Are you a young person with a family member in prison' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.
- **Pupils required to give evidence in court**
  - Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.
  - Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.
- **Serious violence**
  - Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
    - Increased absence from school
    - Change in friendships or relationships with older individuals or groups
    - Significant decline in performance
    - Signs of self-harm or a significant change in wellbeing
    - Signs of assault or unexplained injuries
    - Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
  - Risk factors which increase the likelihood of involvement in serious violence include:
    - Being male
    - Having been frequently absent or permanently excluded from school
    - Having experienced child maltreatment
    - Having been involved in offending, such as theft or robbery

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

- **Sexual violence and sexual harassment between children in schools**
  - Sexual violence and sexual harassment can occur:
    - Between 2 children of any age and sex
    - Through a group of children sexually assaulting or sexually harassing a single child or group of children
    - Online and face to face (both physically and verbally)
  - Sexual violence and sexual harassment exist on a continuum and may overlap.
  - Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.
  - If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting 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
- 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 8 of this policy, as appropriate.

Appendix 5: 5 R's and TED Approach

