St.Theresa's
Catholic Primary School

**ST. THERESA'S CATHOLIC PRIMARY SCHOOL**

# Child Protection and Safeguarding Policy

"We learn together, we play together, we pray together, we grow together in the love of God"

St.Theresa's
Catholic Primary School

Validation grid

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Signed Barbara Costa Barbara Costa

Signed Fiona Kerin

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## Statement of intent

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

The school is committed to developing and maintaining a strong safeguarding culture where:

- Safeguarding is embedded in all policies and practice
- Pupils feel safe, heard and supported
- Staff are confident to raise and escalate concerns
- Leadership monitors safeguarding effectiveness continuously
- Learning from safeguarding incidents informs practice improvements

The school recognises the strengthened national expectation that safeguarding is explicitly **child-centred**, proactive and focused on the **early identification of need**. Staff understand that concerns must not be allowed to escalate and that timely intervention is essential.

The school adopts a **two-tier approach to early intervention**, recognising both:

- **Universal early help**, delivered within school systems; and
- **"Family Help"**, coordinated through multi-agency services where additional support is required.

Safeguarding practice reflects evolving risks including:

- Misogyny, misandry and harmful online narratives
- artificial intelligence (AI), including deepfake content
- serious youth violence and weapon-related harm
- exploitation involving financial, criminal or sexual elements, or coercion

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

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

The school recognises that safeguarding is everyone's responsibility and requires a whole-school culture of vigilance, openness and professional curiosity. We ensure that the voices, wishes and lived experiences of pupils are central to all safeguarding arrangements and decision-making, and that pupils are supported to understand, report and manage risks in both offline and online environments, including emerging risks such as artificial intelligence (AI). We aim to ensure that pupils are confident that they have someone they can turn to if they have a concern.

## Useful Contact Details

Designated Safeguarding Lead: Barbara Costa; office@sttheresas.barnetmail.net; 02083468826.

Deputy Designated Safeguarding Lead: James Troy; office@sttheresas.barnetmail.net; 02083468826
Deputy Designated Safeguarding Lead: Barbara Folan; office@sttheresas.barnetmail.net; 02083468836
Safeguarding Governor: Jane Goring; office@sttheresas.barnetmail.net; 02083468826

**Other Contacts:**

**MASH:**
**Children's Social Care** (for children in need and children at risk of harm)
2 Bristol Avenue, Colindale, NW9 4EW,
Tel: 020 8359 2000
Email: MASH@barnet.gov.uk

**Barnet SCB** (for allegations against staff or volunteers)
Tel: 020 8359 4066
Email: LADO@barnet.gov.uk

**Early Help:**
Tel: 020 8359 2000
https://www.barnet.gov.uk/children-and-families/early-help-children-young-people-and-families/make-referral-early-help-team

**Ofsted**
Email: enquiries@ofsted.gov.uk
Telephone: 0300 123 4234
Address: Piccadilly Gate, Store Street, Manchester, M1 2WD

**Disclosure and Barring Service**
https://www.gov.uk/government/organisations/disclosure-and-barring-service
Email: dbsdispatch@dbs.gsi.gov.uk
Address: DBS, PO Box 181, Darlington, DL1 9FA
Telephone: 01325 953795

**Contact details for advice and support about extremism**
LA *Prevent* lead: Perryn Jasper, Perryn.Jasper@Barnet.gov.uk, Tel: 020 8359 7371 | Mobile: 07856 002 586
Local police force: 101 (the non-emergency police number)

DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors : 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

**Contact details for mandatory reporting of FGM to the police**:
Tel: 101
The national FGM helpline: 0800 028 3550
**NSPCC Inform website**
http://www.nspcc.org.uk/Inform
Telephone: 0808 800 5000
Email: help@nspcc.org.uk

**NSPCC Whistleblowing helpline**

https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/
Telephone: 0800 028 0285
Email: help@nspcc.org.uk

**Office of the Children's Commissioner for England (OCC)**
https://www.childrenscommissioner.gov.uk/
Email: advice.team@childrenscommissioner.gsi.gov.uk
or info.request@childrenscommissioner.gsi.gov.uk

**Acronyms**

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

| Acronym | Long form | Description |
|---|---|---|
| AI | Artificial Intelligence | Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images |
| CCE | Child criminal exploitation | A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| MASH | Multi agency safeguarding hub | The single point of contact for all professionals to report safeguarding concerns. |
| CSE | Child sexual exploitation | A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| DBS | Disclosure and Barring Service | The service that performs the statutory check of criminal records for anyone working or volunteering in a school. |
| DfE | Department for Education | The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England. |
| DPO | Data protection officer | The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act. |
| DSL | Designated safeguarding lead | A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school. |
| EHC plan | Education, health and care plan | A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil. |
| ESFA | Education and Skills Funding Agency | An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults. |
| FGM | Female genital mutilation | All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. |
| UK GDPR | UK General Data Protection Regulation | Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure |

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| | | that procedures relating to personal data are fair and consistent. |
| HBA | 'Honour-based' abuse | So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community. |
| HMCTS | HM Courts and Tribunals Service | HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice. |
| KCSIE | Keeping children safe in education | Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children. |
| LA | Local authority | A local government agency responsible for the provision of a range of services in a specified local area, including education. |
| LAC | Looked-after children | Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours. |
| LGBTQ+ | Lesbian, gay, bisexual, transgender and queer plus | Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities. |
| NPCC | The National Police Chiefs' Council | The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers. |
| PLAC | Previously looked-after children | Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers. |
| PSHE | Personal, social and health education | A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships. |
| RSHE | Relationships, sex and health education | A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships. |
| SCR | Single central record | A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity. |
| SENCO | Special educational needs coordinator | A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs. |
| SLT | Senior leadership team | Staff members who have been delegated leadership responsibilities in a school. |
| TRA | Teaching Regulation Agency | An executive agency of the DfE with responsibility for the regulation of the teaching profession. |
| VSH | Virtual school head | Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker. |

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| WTSC | Working Together to Safeguard Children | Statutory guidance for settings where work and activities relate to children. |

**Definitions**

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

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

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16. Sexual intercourse without consent is rape.

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

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

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

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.

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

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

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

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

**Consensual and non-consensual self-generated intimate images and/or videos including those generated using AI, eg deepfakes."** refers to the creation or sharing of sexually explicit content by pupils, including indecent imagery. For the purposes of this policy, **"indecent imagery"** is defined as an image which meets one or more of the following criteria:

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

This content can be:

- created by the individual themselves
- created or manipulated using **artificial intelligence (AI), including deepfake imagery**

This behaviour is recognised as a safeguarding issue and may constitute criminal activity, although pupils will be supported as victims where appropriate.

For the purpose of this policy **"Misogyny"** is defined as Behaviours or attitudes that display hatred, discrimination or prejudice towards women and girls. Misogyny is recognised as a contributing factor in **harmful sexual behaviour, online abuse, coercion and exploitation**, and forms part of safeguarding risk identification **Misandry** is the hatred, dislike, or ingrained prejudice against boys or men. It functions as a form of sex-based discrimination and is considered the counterpart to misogyny.

The school implements procedures to counter and guard against misogyny and misandry, aware that this aligns with the expectations set out in Ofsted's school inspection framework and DfE guidance on promoting fundamental British values, and also has implications for the teaching of RSE.

For the purpose of this policy "**Artificial Intelligence (AI) safeguarding risks**" are the potential risks to children arising from the use of AI technologies, including exposure to harmful content, manipulation, exploitation, deepfake content, and inappropriate interactions with AI systems

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including when they see, hear or experience its effects. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care-giver abuse.

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

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

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object), or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images or watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school's policy and procedures for dealing with it.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment);
- protect a child from physical or emotional harm or danger;
- ensure adequate supervision (including through the use of inadequate caregivers);
- ensure access to appropriate medical care or treatment.

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

## 1. Legal framework

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

**Legislation**

- Children Act 1989
- Sexual Offences Act 2003
- Crime and Policing Act 2026
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

**Statutory guidance**

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2026) 'Working Together to Safeguard Children 2026'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education 2026'
- Working Together to Improve School Attendance 2026
- Meeting Digital and Technological Standards for Schools and Colleges 2022
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

## 2. Roles and responsibilities

**All staff have a responsibility to**:

- Read and understand Part Once of KCSIE in full, regardless of role.
- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.

- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to MASH, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASH and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Understand how safeguarding incidents may present differently in different pupils.
- Use professional curiosity to explore and report signs of abuse, neglect and exploitation. This includes serious violence, including weapon possession or intent, misogynistic or harmful online behaviours and AI-generated or manipulated content.
- Be confident to challenge decisions and escalate concerns where necessary.
- Understand the importance of hearing and recording the child's voice.

**Teachers, including the headteacher, have a responsibility to**:

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

**The governing board has a duty to**:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.

- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that all staff, whether or not they work directly with children, read at least Part One of KCSIE.
- Ensure that all staff who work with children and all staff in management roles read Annex A, which provides further information on types of abuse.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions, thus ensuring access to a DSL or Deputy at all times.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, and how to keep themselves safe, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by ensuring the school conducts pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers who do not have a DBS with barred list are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.

- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The headteacher has a duty to:

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

The DSL has a duty to undertake the role as described in KCSIE Annex B. This includes and is supplemented by the need to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.

- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
    - To MASH where abuse and neglect are suspected, and support staff who make referrals to MASH.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child, and to the TRA, if there is consideration that the person is not suitable to undertake teaching work.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with members of the safeguarding team to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
    - Ensuring that the school knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.
    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared. Where there are concerns, it is expected that there will be a conversation between the DSL and the DSL at the new school. The file must be transferred confidentially to the DSL and not included in general pupil transfer information. The school must obtain confirmation of receipt.

- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process. Undertake activities to verify staff understanding of safeguarding requirements.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly on the school website and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and renew this training at least every two years, with at least annual updates.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping. Ensure that records of safeguarding-related meetings and discussions include
  - A summary of the discussions
  - The decisions taken
  - The rationale for such decisions, including any decision that the threshold has not been met for an external referral.
- Ensure that the lived experience and voice of the child inform all decision-making.
- Promote a culture where staff feel confident to escalate concerns or disagreements (professional challenge).
- Ensure safeguarding arrangements reflect emerging risks, including AI and online harms.
- Ensure that all staff understand the difference between early help, safeguarding concerns, and harm threshold cases.
- Ensure safeguarding systems reflect increased expectations around information sharing and multi-agency coordination and early identification and escalation.
- Undertake risk assessment where concerns relate to serious violence, including weapon possession or threats of harm and peer-on-peer escalation and conflict.
- Undertake a pupil risk assessment whenever a child with a safeguarding concern is admitted to the school and/or an existing pupil is added to the child protection register.
- Ensure appropriate consideration of, and staff understanding of, gender identity-related safeguarding issues and risks linked to AI-generated abuse or exploitation.
- Ensure enhanced information transfer when pupils move schools, including risks to others, harmful sexual behaviour concerns and serious violence indicators.
- Liaise with the school's Attendance Champion to maintain an awareness of any pupil attendance issues which may also be a safeguarding concern.
- Ensure awareness of the updated CCE and CSE indicators and Operation Encompass duties
-

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

## 3. Multi-agency working

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

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

The school will work with MASH, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for MASH from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

Safeguarding relies on strong, transparent and timely multi-agency working. Staff will actively contribute to inter-agency plans and will not allow concerns to be diluted or delayed. Where there is disagreement between professionals, the school will follow escalation procedures to ensure children's safety remains paramount.

### Information sharing

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

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

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

Staff will ensure that information sharing is timely, proportionate and child-centred, and that failure to share information is recognised as a potential safeguarding risk.
Staff must recognise that:

- **failure to share information can itself be a safeguarding risk;** where there is a safeguarding concern about a child, safeguarding requirements take precedence over considerations of GDPR
- effective safeguarding requires **timely, proactive and coordinated information sharing**

The school will ensure stronger alignment with multi-agency expectations and statutory frameworks. Staff must be made aware of the statutory duty, introduced by **The Crime and Policing Act 2026**, for individuals working or volunteering with children to report sexual abuse to the police and children's social care when they become aware of it. Staff should also be made aware of what will happen next if they fail to report or attempt to deter and individual making a report under the mandatory reporting duty.

## 4. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. This includes universal services, community-based Early Help or the targeted early help level of Family Help. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.
Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in custody, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of, or have been, permanently excluded from school, colleges and in Alternative Provision or a PRU.

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

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

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

Members of the safeguarding team will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and

consideration given to a referral to MASH for assessment for statutory services if the pupil's situation is not improving or is worsening.

Early help assessments will ensure that the child's views, wishes and feelings are clearly recorded and influence planning and decision-making.

## 5. . Abuse, neglect, exploitation and serious violence (including modern slavery)

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

All staff will understand that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. This includes concerns related to serious violence such as when a pupil is carrying or has access to a weapon and/or has expressed intent to seriously harm others. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure. The DSL will undertake a **dynamic risk assessment** and take appropriate action, including multi-agency referral where required.
All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

### Safeguarding children with medical conditions

Children with medical conditions have the potential for additional safeguarding vulnerability, including the risk of abuse, neglect or exploitation. Such concerns must be reported initially to the DSL and would usually be managed in school. A safeguarding referral would be needed only where an incident indicates that a child might be at increased risk of neglect, abuse or exploitation because of their medical condition. For example, this might occur where relevant medical information is not provided to the school or where children are repeatedly sent to school without essential medication.

## 6. Specific safeguarding issues

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

Section 25 of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

## 7. Child-on-child abuse (including harassment and violence)

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

The school recognises that harmful sexual behaviour (HSB) exists on a continuum and requires a proportionate, risk-based response. All reports of HSB will be taken seriously, recorded appropriately, and responded to in line with this policy and KCSIE guidance.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent. Staff are aware of the times when children might be at highest risk throughout the day, such as immediately after school.

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

When identifying pupils at risk of potential harm or who have been harmed by their peers, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Changes to their social group, e.g. spending time with older pupils, or social isolation
- Alcohol or substance misuse

All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse and serious violence – this may include threats involving weapons and online elements which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse. This includes AI-generated sexualised content, including deepfakes.
- Misogyny, misandry and gender-based harm.
- Harassment and violence linked to online cultures
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

Staff will recognise that abuse may involve both victim and perpetrator vulnerability, and all cases will be treated as safeguarding concerns. All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

If the incident/allegation involves harmful sexual behaviours the safeguarding team will:

- Reassure the victim, ensuring that they feel safe in school
- Offer the student support through, onsite counselling, SEMH support or a referral to Early help/BICS
- Refer to the Brook's Sexual Behaviour Traffic Light Tool for guidance (Appendix I)
- Assess whether a MASH or Police referral is required
- Consider context, power, imbalance and coercion
- Avoid normalising harmful behaviour
- Complete a risk assessment and these are dynamic and regularly reviewed
- Complete a child on child safety plan template (Appendix II)
- Where appropriate, sanction the perpetrator in line with the behaviour and anti-bullying policy
- Refer the perpetrator for support through early help, safer schools' team or MASH

Staff will follow these procedures, as well as the procedures outlined in the school's Anti-Bullying Policy and Behaviour Policy, where relevant.

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

## 8. Online safety and personal electronic devices

The school will adhere to the Online Safety Policy at all times.
As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

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

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.
- Understanding AI-related safeguarding risks, including deepfake imagery and manipulated content used for coercion.
- Misogynistic influencers and ideologies and radicalisation linked to gender-based harm.
- Recognising online manipulation and exploitation patterns.
- Teaching pupils to critically evaluate online content and recognise manipulation.

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

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

The school recognises that technology, including AI, is a significant factor in safeguarding. Pupils may be exposed to or involved in risks such as:

- AI-generated and deepfake imagery or misleading and manipulated content
- Misogynistic content, including influencers and ideologies and radicalisation linked to gender-based harm
- Online grooming and exploitation
- Exposure to extremist material

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

**Communicating with parents**
As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

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

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

**Personal electronic devices**
The use of personal electronic devices, including mobile phones, cameras, smart watches and other devices capable of taking and storing images, by staff and pupils is closely monitored by the school, in accordance with the Staff Code of Conduct and Acceptable Use Policy. In summary, from a pupil point of view, the school is a mobile phone-free zone. When, by the school's agreement with parents or carers, a pupil can use a mobile phone when travelling independently to and from school, for example, this is to be handed in to the school office/form tutor on arrival and collected at the end of the school day.
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 pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures. If a member of staff believes that a pupil has a device which contains indecent images, including nudes or semi-nudes, the device must be confiscated and the DSL informed. Staff must not, under any circumstances;

- View the images in question, since this may make them vulnerable to allegations of viewing and sharing indecent images
- Delete the images, since these may be needed as part of a future police investigation

If a member of staff has been unable to avoid viewing an indecent image on a pupil's device, he/she must, for his/her own protection, immediately inform the DSL and Headteacher, with an explanation of the circumstances.

## 9. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual self-generated intimate images and/or videos including those generated using AI, e.g. deepfakes, as a safeguarding concern.

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

understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

## 10. Context of safeguarding incidents

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

## 11. Pupils potentially at greater risk of harm

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

### Pupils who need social workers

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

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

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

### Home-educated children

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

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

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

### LAC and PLAC

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

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

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

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

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

**Pupils with SEND**

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

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

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

**LGBTQ+ pupils and pupils questioning their gender**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals and face increased vulnerability both online and offline. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have and evaluate whether pupils require sensitive, case-by-case safeguarding responses.
Safeguarding decisions will prioritise welfare and safety and consider parental involvement unless this places the pupil at risk.
Arrangements relating to:

- Toilets
- Changing and showering facilities

- Trips and overnight stays

will be managed safely and in line with current statutory expectations. Children are not allowed to use toilets, showers and changing rooms designated for the opposite biological sex. If a gender-questioning child does not want to use the toilet, shower or changing facility designated for their biological sex, the school will consider whether it can provide an alternative toilet facility, without compromising single-sex toilet provision. The school will keep a clear record of these situations, communicate them appropriately and review them regularly.

**Pupils requiring mental health support**
All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will consider how intersectionality (e.g. SEND, race, gender, identity, and socio-economic factors) may increase vulnerability and may affect how abuse is recognised and responded to.
Where a pupil is believed to be at **immediate risk of harm**, staff must:

- contact emergency services (999), or
- support urgent access to medical help

This reflects the strengthened expectation to treat mental health crises as **safeguarding emergencies where appropriate.**

## 12. Use of the school premises for non-school activities

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

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

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

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to MASH or the police, if necessary.

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

All extracurricular club leaders will read and sign the Visitors' Briefing Document (Appendix IV).

## 13. Alternative provision

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

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

## 14. Work experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place to protect children from harm. If the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight, this is a regulated activity. The school must not allow someone on the barred list to take part in regulated activity.

Where the school has pupils from other educational establishments undertaking work experience at the school, an enhanced DBS check will be requested from the pupil's school or college if the pupil is over the age of 16. Where someone under the age of 18 undertakes work experience or a work placement at the school, the school has a safeguarding duty both towards that pupil and its own pupils.

## 15. Homestay exchange visits

### School-arranged homestays in UK

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

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

### School-arranged homestays abroad

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

### Privately arranged homestays

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

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

## 16. Concerns about pupils

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

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

Staff will ensure that all concerns are:

- Clearly recorded
- Include the child's voice
- Reflect professional judgement and rationale

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

The member of staff must:

- Promptly log the concern on the school safeguarding system "MyConcern" and speak to the DSL, or a member of the safeguarding team.

All staff will receive training on MyConcern in their induction and will receive a login for MyConcern on their first day of employment at the school. Staff can also seek advice from the MASH team.

Following the receipt of a concern, the DSL will then decide on the appropriate course of action. The flowchart in Appendix IV will be used.

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

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

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.

All concerns, discussions and decisions made, as well as the reasons for those decisions, will be recorded on MyConcern by the DSL or a member of the safeguarding team. Any paper based concerns will be kept securely in a locked cupboard in the headteacher's office.

If a pupil is in immediate danger, a referral will be made to MASH and/or the police straight away. If the pupil has committed a crime, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

## 17. Managing referrals

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

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

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

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by MASH. Where MASH decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where MASH decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

The school will not delay action while awaiting further information where there is a risk of harm. Immediate safeguarding concerns will always take precedence.

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

## 18. Concerns about school safeguarding practices

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed

- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

The NSPCC runs a whistleblowing helpline on behalf of the Government, the number is 0800 028 0285.

## 19. Safeguarding concerns and allegations of abuse against staff

For allegations of abuse made against staff (including supply teachers), volunteers and contractors, the school will follow guidelines outlines in Part 4 of Keeping Children Safe in Education 2023 (this includes information about low level concerns). A copy of part 4 can be found in the school Staff Code of Conduct.

Actions to be taken, include making an immediate online record (using the Staff Concern reporting option on MyConcern) of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. The Executive Headteacher will then refer the concern to the Local Authority Designated Officer Rob Wratten Tel No: 0208 359 7899 (LADO) or deal with the matter under the staff Disciplinary Policy, dependent on the advice given by the LADO.

If the concerns are about the Executive Headteacher, then the Chair of Governors should be informed (Mrs Fiona Kerin) via the school office (office@sttheresas.barnetmail.net or 0208 346 8826).

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

If a staff member feels unable to raise a concern with the senior leaders of the school, they should access other whistleblowing channels e.g. NSPCC 0800 028 0285

If the allegation is substantiated and the individual resigns or is dismissed, the school will refer it to the DBS. They will also consider referring the matter to the TRA for consideration for a prohibition order.

Expectation of staff behaviour is outlined in the Staff Code of Conduct.

Staff should feel empowered and confident to share any concerns with the DSL. The DSL will contact the LADO for advice.

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

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

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

- doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:
- inadvertent or thoughtless behaviour.
- behaviour that might be considered inappropriate depending on the circumstances.
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:
- being over friendly with children.
- having favourites.
- adults 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.
- using inappropriate sexualised, intimidating or offensive language.

The school promotes a culture where low-level concerns are:
- Reported openly
- Recorded consistently
- Used to identify patterns of behaviour

## 20. Communication and confidentiality

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

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

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

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

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

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

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

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

## 21. Safer recruitment

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

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

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

The school will conduct the appropriate pre-employment checks for al prospective staff*, including internal candidates and candidates who have lived or worked outside the UK.

*The DfE defines as staff any person working at the school, whether:

- under a contract of employment [this covers every employee, no matter what sort of work they do];
- under a contract for services [this covers self-employed people arranged and/or paid direct by the school; it does not include those in a contract for services with others, subject to the exception immediately below];
- otherwise than under a contract [this covers self-employed people who are arranged by the school for the purposes of the school but, for example, paid direct by parents, such as some peripatetic teachers and therapists; it does not include, for example, private employees of parents permitted to enter school by agreement];

The definition does not include agency supply staff or volunteers.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, contractors and self-employed workers.

### Staff suitability

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

- Have certain orders or other restrictions placed upon them.

- Have committed certain offences.

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

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

**Referral to the DBS**
The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended. The school will also refer to the DBS anyone who applies for a position at the school and is clearly ineligible to work with children. The school will also refer to the TRA anyone who is dismissed or has left the school where there is consideration that, the person is not suitable to undertake teaching work.

## 22. Single central record / register (SCR)

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

All members of the Governing Body are also recorded on the SCR.

The following (when required) information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- At least two references
- At least two references
- A check for unexplained gaps in employment history
- A self-declaration of medical fitness
- A check of any qualifications required by the post or relevant qualifications declared by the candidate
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK including
    - Overseas criminal records check
    - Letter of professional standing if a person has undertaken teaching work outside the UK and will be undertaking teaching work at the school
- A Prohibition from Management (also known as a Section 128) check for governors

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

The school is aware that self-employed people are not able to make an application directly to the DBS on their own account. When employing the services of self-employed workers and contractors,

the school will consider obtaining the DBS check on their behalf, and recording this information on the SCR. If a self-employed person can obtain a DBS (for example, through his or her professional association) this can be accepted by the school. However, the school must see the certificate and verify that it is at the right level (ie. enhanced with barred list) and whether it contains any information on convictions to be evaluated.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. For volunteers, it is a requirement to undertake a risk assessment to determine and record which recruitment checks are needed in relation to the role being undertaken, including assessment of whether a volunteer should be subject to an enhanced DBS check. The risk assessment will be recorded.
Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

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

## 23. Safeguarding and Sport

As children get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools and colleges can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where this is the case there must be no exceptions. In other cases, the school may adopt a policy of single-sex sports for reasons related to fairness.

Where there are no safety concerns and a child makes a request relating to how they participate, the school will consider the request in light of the advice on "considering requests for support with social transition". This means that the school will take into account all the relevant factors, including whether supporting social transition is, overall, in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

## 24. Training

Staff members will undergo safeguarding and child protection training at induction and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE)
- The Behaviour Policy.
- The Attendance Policy
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring and teaching the children who to keep themselves safe
- Information about the role and identity of the DSL and deputy DSLs.
- Annes A of KCSIE for staff who work with children or take up management roles

- The Whistleblowing Policy

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually in line with KCISE. This will include whistle-blowing procedures and online safety and all staff will receive separate Prevent awareness training.

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

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

- The assessment process for providing early help and statutory intervention, including local criteria for action and MASH referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to MASH.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers. Being a young carer can impact attendance, attainment, behaviour and wellbeing. As in other areas of safeguarding, early identification is key to making sure young carers receive support at the right time from the right services.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

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

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

The Governors are required to do regular training as appropriate to their role.

## 25. Specific safeguarding issues

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

Here are the issues covered:

- Domestic abuse
- Homelessness
- Children absent from education
- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Cyber-crime
- Child sexual exploitation (CSE)
- Modern slavery

- FGM
- Forced marriage
- Radicalisation
- Pupils with family members in prison
- Pupils required to give evidence in court
- Mental health
- Serious violence

**Domestic abuse**

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

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

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

**Homelessness**

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.
Indicators that a family may be at risk of homelessness include:

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

Referrals to the Local Housing Authority do not replace referrals to MASH where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to MASH will be made as necessary where concerns are raised.

**Children absent from education**

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

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

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

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. The school will hold at least two telephone numbers at which a parent, relative, friend or neighbour can be contacted in an emergency. For pupils in the EYFS, it is a requirement to have at least three emergency contacts. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

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

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

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

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

Changes to information in the admissions register, as noted above, must be recorded as additions to the register. The original information must not be overwritten or deleted.
Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

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

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

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information in the manner in which the LA requires the information to be submitted:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives

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

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

**Child abduction and community safety incidents**

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

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

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

**Child criminal exploitation (CCE)**

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

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

This type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups.
Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.
- Cuckooing
- Causing internal concealment of item for criminal purpose

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

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

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

- Regularly becoming absent from school or education or not taking part.

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

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

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

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

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

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

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

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

Since April 2025, the school has a statutory duty to report any cyber attack to the National Cyber Security Centre (NCSC).

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

- In exchange for something the victim needs or wants

- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

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

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

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

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

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

**Modern slavery**

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

**FGM**

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

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

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), all staff who undertake teaching work are **legally required** to report to

the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Failing to report such cases may result in disciplinary action. Staff will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the staff member has a good reason not to, they should also consider and discuss any such case with the DSL and involve MASH as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

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

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

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

Indicators that FGM may take place soon include:

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

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

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

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

## Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will. To assist in combatting forced marriage, in February 2023, the age at which someone can get married was raised, without exceptions, to 18.

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

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

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

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

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

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

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

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

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

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

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

The school will support any victims to seek help by:

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

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

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

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

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

**Radicalisation**

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

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

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

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

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise

concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

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

**The Prevent duty**

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

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

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

**Mental health**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. . Staff must be aware of how mental health concerns intersect with safeguarding duties, particularly around risks including self-harm, eating disorders and suicidal ideation. The early identification of risk and targeted support is essential. Staff must take immediate action, including informing the DSL, when a child discloses harm, including harm related to mental health.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

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

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Where a pupil is believed to be at **immediate risk of harm**, staff must:

- contact emergency services (999), or
- support urgent access to medical help

This reflects the strengthened expectation to treat mental health crises as **safeguarding emergencies where appropriate**

From a perspective of preventing poor mental health and taking steps to avoid mental health situations from deteriorating, schools have a key role to play in:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing or at risk of developing mental health problems
- making sure early targeted support is provided
- liaising with and referring to specialist services where needed.

**Serious violence**

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

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

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

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL. This includes concerns where a pupil is carrying or has access to a weapon and/or has expressed intent to seriously harm others.

The school will be aware that the Police, Crime, Sentencing and Courts Act will introduce a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

## 26. Safeguarding training criteria

**Purpose**

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

**Core training requirements**
**The DSL and deputy DSLs will:**

- Complete advanced safeguarding training every two years, which covers:
  - Their specific roles and responsibilities.
  - Multi-agency working.
  - Identifying, understanding and responding to specific needs that can increase the vulnerability of pupils.
  - Specific harms that can put pupils at risk.
- Undertake training that enables them to develop expertise so that they can support (and advise) staff and help them feel confident on welfare and safeguarding matters, particularly in relation to:
  - Ensuring that staff are supported during the referrals process.
  - Supporting staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Receive regular updates throughout the year to remain informed of any changes in legislation and best practices.
- Undertake Prevent awareness training.

**All staff will:**

- Complete safeguarding and child protection training at induction.
- Undertake refresher training annually, including updates on recognising signs of abuse, reporting procedures, and understanding the school's Child Protection and Safeguarding Policy, Behaviour Policy, Staff Code of Conduct and Safeguarding response to pupils who are absent from education.
- Read at least part one of KCSIE and, if they work with children or hold a management role, Annex A, and ensure that they are aware of:
  - The local early help process and their role in it.
  - The process for making referrals to LA children's social care and for statutory assessments.
  - The indicators of abuse, neglect and exploitation.
  - Safeguarding issues that can put pupils at risk of harm.
  - Child-on-child abuse, including how it can happen, the school's procedures for dealing with it and how to prevent and respond to it.
  - What to do if a pupil tells them they are being abused, exploited or neglected and how to manage confidentiality.
  - How to support victims of abuse, neglect and exploitation.
- Receive ongoing updates throughout the academic year via the staff updates and staff meetings, including updates to safeguarding guidance and legislation and changes to the school's safeguarding policies and procedures.
- Undertake at least annual cyber security training
- Undertake training in risk assessment, as relevant to their roles.

**Members of the governing board will:**

- Complete appropriate safeguarding and child protection training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.
- Undertake updated safeguarding training relevant to their strategic role, including awareness of their responsibilities under KCSIE.

- Be trained on their obligations under the Human Rights Act 1998, the Equality Act 2010, and the local multi-agency safeguarding arrangements
- Receive enhanced training to effectively oversee the school's safeguarding arrangements if their role on the board has a specific safeguarding responsibility.
- Ensure that at least one governor undertakes at least annual cyber security training.

**Specialist training**

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

- **Safer recruitment training:**
  - Will be required for all staff members involved with the recruitment and employment of staff to work with pupils, the substance of which covers part three of KCSIE at a minimum.
- **Online safety training:**
  - It is mandatory for all staff and governors to understand the risks associated with online activity and how to educate pupils about online safety.
  - Online safety training will include, amongst other aspects, understanding the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
  - All staff and at least one governor must undertake at least annual cybersecurity training
  -
- **Prevent duty training:**
  - All staff will be trained to understand their role in preventing radicalisation and extremism and how to maintain due regard to the need to prevent people from becoming terrorists or supporting terrorists.
- **Child-on-child abuse awareness:**
  - Staff will receive specialist training on recognising and addressing child-on-child abuse, including bullying, sexual violence, and harassment.

**Training Delivery**

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

**Reviewing training**

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

**Compliance**

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

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

## Appendix I: Brook's Sexual Behaviours Traffic Light Tool

brook

SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

### Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

### Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/ skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

### Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

brook

# SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

## Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

### Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

### Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

brook

# SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

## Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

### Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/ or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

### Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

## Appendix II: Child on Child Safety Plan template

| |
|---|
| Name of child/young person: |
| DOB: |
| School/education setting: St. Theresa's Catholic Primary School |
| Class: |
| Date of completion: |
| Present at meeting: |
| **1 Background Information** |
| 1.1 Please provide an overview of the known sexual behaviour concerns in school, home and community: |
| School:<br><br>Home:<br><br>The Community: |
| 1.2 Provide an overview of other behaviour concerns:<br>*Such as bullying, violence, disruptive behaviour.* |
| |
| 1.3 Other relevant factors:<br>*Family background, Children's social care involvement, learning difficulties/disabilities/cultural/ religious factors.* |
| |
| 1.4 What interventions/consequences are already in place or have taken place:<br>*Restrictions on activities/movement around the school, one-to-one work or whole school/class work, specialist services.* |
| |
| 1.5 Child's views regarding their sexual behaviour and other behaviour concerns:<br>*Do they understand the concerns, do they deny or accept the behaviours, are they embarrassed, angry, remorseful etc.?* |

| |
|---|
| |
| 1.6 Parent's/carer's views regarding child's sexual behaviour and other behaviour concerns:<br>*Are they angry, rejecting, supportive, minimising, concerned?* |
| |
| **2 Identifying Risks** |
| 2.1 Record any known triggers to the behaviour:<br>*Particular lessons, activities, peers, staff and events outside of school.* |
| |
| Where identified, detail strategies to reduce triggers:<br>*What supervision is available to support the young person, can the child identify triggers to the behaviour?* |
| |
| 2.2 Identify any risky locations:<br>*Include locations **within the school** i.e. toilets, unsupervised areas, corridors, playgrounds etc.*<br><br>*Consider locations in **the community** known to be of potential concern.* |
| |
| Where risky locations are identified, detail plans to minimise risk:<br>*Using different toilets/toilet times, additional supervision? No-go areas for child/young person?* |
| |
| 2.3 Identify any significant others: |

| |
|---|
| *Staff, visitors and other children who might be **vulnerable** (maintain appropriate confidentiality within this).*<br><br>*Adults, peers, gangs/groups who might be **influential** (sexual or other behaviour)* |
| |
| Where vulnerable individuals have been identified detail plans to minimise risk:<br>*Supervision, assessing suitability for contact activities, consideration of classroom seating arrangements, consider whether 1:1 work is appropriate.* |
| |
| 2.4 Identify any risky activities:<br>*RSE lessons, school trips, PE – getting changed/contact sports, residential stays.* |
| |
| Where identified, detail strategies to minimise risk:<br>*Supervision, changing in different room, can activities be safely conducted without supervision?* |
| |
| 2.5 Explore child's/young person's access to internet/media and any associated risks (includes personal devices):<br>*How is this monitored? Are safety settings/filters applied? Are they accessible in unstructured times, e.g. phones not accessible during the day, supervision of internet.* |
| |
| Where identified, detail strategies to minimise risk:<br>*Supervised access, use of filters, no personal devices, whole school e-safety.* |
| |
| 2.6 Explore and record the transport arrangements to and from school:<br>*Walking, bus, car, shared transport arrangements. Include whether the child is transported by the local authority, whether they are transported with other children, what the supervision arrangements are, is the person supervising e.g. taxi driver, aware of the potential risks and is an appropriate person to manage them, consider whether the child/young person should be transported individually or with additional supervision.* |
| |
| Where concerns identified, details action/changes required to transport arrangements: |
| |

| **3 Strengths** |
| --- |
| 3.1 Identify areas/locations within the school that are not assessed as requiring additional planning/supervision at this time:<br>*Please note areas where there has been no history of incidents or concerns or where existing supervision manages risk.* |
| |
| 3.2 Please describe positive relations the child has:<br>*Include professionals, family, peers etc.* |
| |
| 3.3 Please note activities/lessons the child enjoys and engages positively in:<br>*Describe how these will be promoted and maintained*<br>*Consider any additional activities that could be encouraged to promote pro social behaviour and self-esteem.* |
| |
| 3.4 Please identify positive attributes/characteristics/skills the child possesses which can be promoted to support them meeting their emotional needs in a healthy way: |
| |
| **4. Implementation** |
| 4.1 Who needs to know about this plan:<br>*Consider lunchtime supervisors, student support staff, volunteers, contractors, governors.*<br>*Who will share this information and when?* |
| |
| 4.2 Work to be undertaken with the young person and wider school population:<br>*Include 1-1 work, e.g. emotional literacy, communication skills, empathy work, Online Safety, RSE.*<br>*Note whether this is individual or wider school work.* |
| |

| |
|---|
| |
| 4.3 Referrals for external support:<br>*Note any identified need.*<br>*For referrals to external/specialist services e.g. CAMHS, NSPCC, Safeguarding, Therapeutic Support.*<br>*Who will make the referral – timescales for referral.* |
| |
| **5 Measuring Risk** |
| 5.1 How will you measure whether the level of risk has changed:<br>*This may include a change in the child's view regarding their behaviours:-*<br>• *A reduction or increase of incidents of sexual behaviours*<br>• *A reduction or increase in other concerning behaviours*<br>• *A reduction or increase of pro social behaviour/activities* |
| |
| 5.2 Review date:<br>*The plan should be reviewed every three months or if there is a further event that impacts on risk.* |
| |

| | |
|---|---|
| Signatures of attendees: | |

**Appendix III**

**St. Theresa's School Primary School**
**Safeguarding Children**
**Visitors Briefing Document for parents, volunteers, governors, supply staff, contractors**

Safeguarding and Child Protection is extremely important to all schools' staff and pupils. All visitors are required to comply with the guidelines set out in this briefing document.

**As a visitor to the school please adhere to the following procedures:**

- Sign in at the main reception and sign out when you are leaving
- Ensure your visitor badge is clearly displayed at all times whilst you are in the school
- Ensure you are accompanied by a member of staff (unless otherwise advised)
- All visitors that are working on the site must report to the main reception and arrange for their identity to be checked before they start work *or* accompanied by a member of staff at all times.

**Confidentiality**
We expect all adults volunteering in the school, in classes, or on trips to ensure that information pertaining to any child in this school is kept private and confidential; it should not be shared with other parents.

**What to do if you have a safeguarding or child protection concern:**
In the event that you are concerned about the protection or safeguarding of a child please contact the Designated Safeguarding Officer: Barbara Costa (Executive Headteacher)
Or a member of the safeguarding team: James Troy (Head of School) and Barbara Folan (Inclusion Leader)
Or the Barnet Multi-Agency Safeguarding Hub **020 8359 4066**

**Individual Responsibilities**
All persons should be aware of issues related to the protection of children. Remember that someone else might misinterpret your actions, no matter how well intentioned.
*You should:*

1. Dress appropriately
2. Treat all persons with respect
3. Use the school ICT equipment (if applicable) for school purposes only

*You must not:*

- Have inappropriate physical or verbal contact with pupils
- Use the pupils' toilets
- Ignore concerns if you hear them raised by a child
- Smoke on the premises
- Use your mobile phone to take calls, text message or take photos of the children when you are working directly with children
- Leave your mobile phone on display when not in use
- Directly work (unsupervised) with children unless you have completed a DBS check through the school

**Fire Escape Instruction and other Health and Safety Issues**

i. Familiarise yourself with the fire escape signs and instructions displayed around the school. If the fire alarm sounds, follow the fire escape signs.
ii. Please be on the lookout for safety notices and instructions around the school.
iii. Visitors such as electricians, builders etc. should liaise with the school site manager.

I have read and understood this briefing document. I agree to adhere to the guidelines.

Signed …….

Name …… (print name) Date ……..

The following policies can be found on the staffroom notice board or requested from the school office; Child Protection and Safeguarding, Staff Code of Conduct, Whistleblowing Policy. For the school's procedure in dealing with allegations against staff please use the following link (Part 4)
Keeping children safe in education 2026 (comes into force from 1 September 2026)

## Appendix VI: Reporting a Concern Flowchart Safeguarding

## ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

**Designated Safeguarding Lead(s):**

Barbara Costa (EHT)

James Troy (HoS)

Barbara Folan (Inclusion Lead)

**Link Governor:**

Jane Goring

Staff have a concern and take immediate action. Member of staff speaks to DSL

Staff member logs concern onto MyConcern and speaks to DSL.

The local authority Designated Officer for concerns about adults is:

Local Authority Designated Officer Rob Wratten

Contact details (via MASH):

Tel No: 0208 359 4066

Designated Safeguarding Lead reviews concern and makes a decision about next steps

Decision made to monitor the concern locally

Decision made to discuss the concern with the parents/carers

Decision made to refer the concern to social care (and call police if appropriate)

**Monitor**

**Discuss**

**Refer**

Class teacher asked to monitor child and feedback to the Designated Safeguarding Lead within an agreed timescale

**Monitor**

Once discussed with parents Designated Safeguarding Lead decides to discuss further with parents, monitor, refer for Early Help or refer to social care

**Refer**

Designated Safeguarding Lead discusses decision with another member of the safeguarding term or SLT and agree to refer to social care and/or police

*In exceptional circumstances, anyone may report concerns directly to children's social care.*

*NSPCC Whistleblowing Helpline 0800 028 0285*

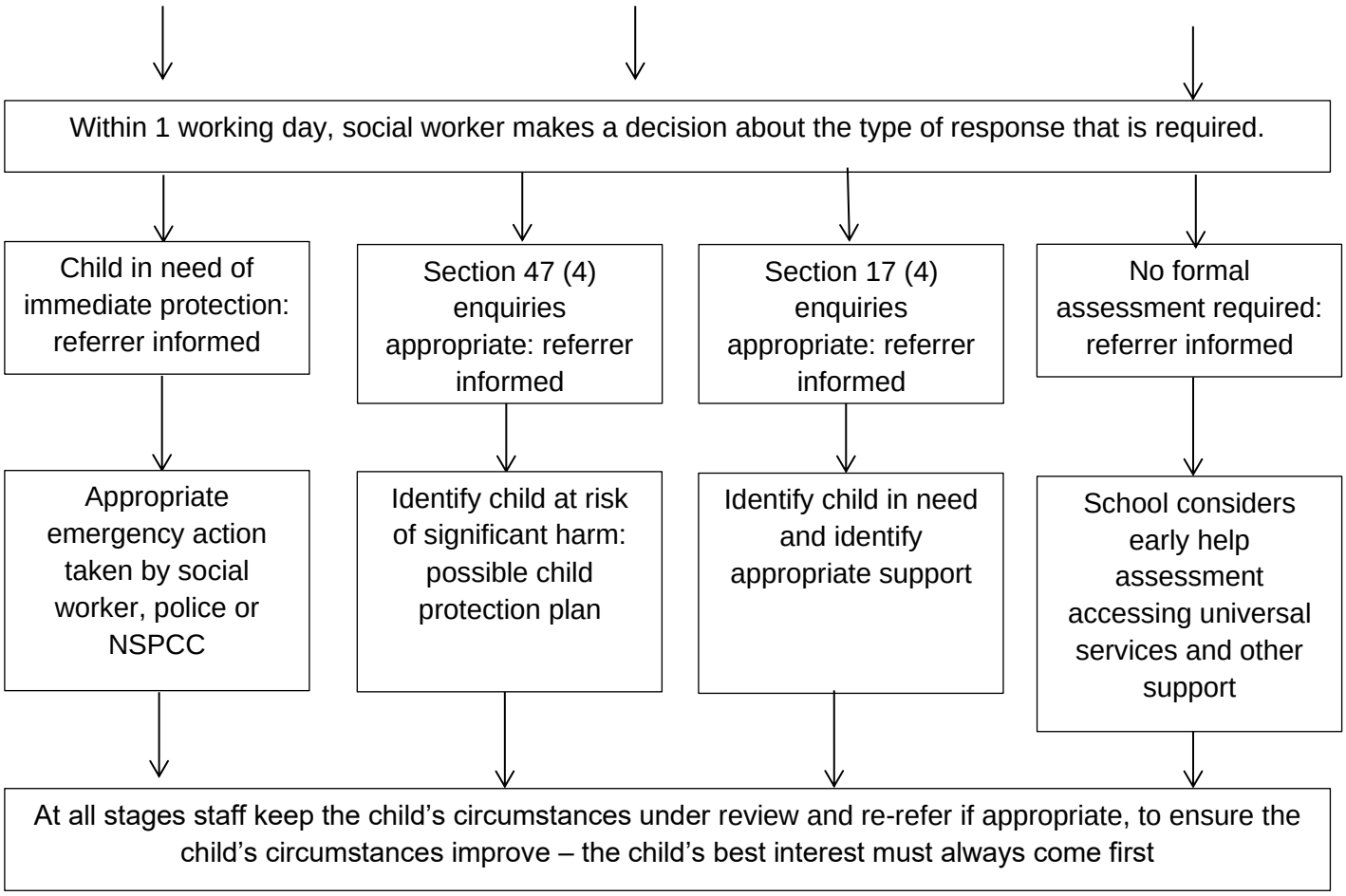
**Record**

Designated Safeguarding Lead logs any decisions onto MyConcern.

Contact Details
Social Care Referrals:

MASH 020 8359 4066
Prevent/Channel Referrals:

Perryn Jasper – Barnet Prevent Lead
Perryn.Jasper@barnet.gov.uk
02083597371


Within 1 working day, social worker makes a decision about the type of response that is required.
Child in need of immediate protection: referrer informed
Section 47 (4) enquiries appropriate: referrer informed
Section 17 (4) enquiries appropriate: referrer informed
No formal assessment required: referrer informed
Appropriate emergency action taken by social worker, police or NSPCC
Identify child at risk of significant harm: possible child protection plan
Identify child in need and identify appropriate support
School considers early help assessment accessing universal services and other support
At all stages staff keep the child's circumstances under review and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interest must always come first