



Learn, Grow, Love, Live

Safeguarding and Child Protection Policy 2024-2025

Version	Date	Description of changes and person/organisation responsible
001	September 2022	Implemented
002	March 2023	Policy Updated
003	September 2023	Policy Updated
004	December 2023	Amendment to DSL staff names
005	January 2024	Amendments in line with Working Together To safeguard Children (Dec 23) updates
006	September 2024	Annual Policy Updates
007	October 2024	Change in Chair of Governor amendment
008	December 2024	Change in Chair of Governor amendment
009	January 2025	Changes in Safeguarding Team

People Responsible:	Headteacher Governing Body
Reviewed date:	September 2024
Next review date:	September 2025

Mission Statement

At Holy Cross Catholic Primary School,
we learn about ourselves and about the world.
We grow in faith,
we act with kindness, generosity and love
to ourselves and others.

We live life to the full and have a future full of hope.

Reference	Title	Page
	Quick Reference Contacts Guide	3
Part 1 – Aims and Legislation		
1	Introduction	4
2	Legislation	4-5
3	Definitions	5 - 6
4	Equality Statement	7
5	Roles and Responsibilities	7-11
6	Confidentiality	11-12
Part 2 – Procedures		
7	Recognising abuse and taking action	13
7.1	Worried About A Pupil	13 – 15
7.2	When are Parents/Carers Contacted	15
7.3	The Role of The Designated Safeguarding Lead and Deputy DSL/s In Our School	15 - 17
7.4	Next Steps - Early Help Assessment	17 - 18
7.5	Making a Referral to Social Care	18 - 19
7.6	Case Resolution	19 - 20
7.7	Supporting a Pupil	20
7.8	Record-keeping	20 – 21
7.9	Worried About the Actions of an Adult Who Works/Volunteers with Pupil	21 – 25
Part 3 - Specific Safeguarding Themes/issues		
8	Safeguarding Themes	26
8.1	Child on Child Abuse	26
8.2	Bullying (including Cyberbullying)	26 – 27
8.3	Child on Child Sexual Abuse	27 – 28
8.3.1	Responding to concerns about child on child sexual abuse	28 – 29
8.3.2	Additional guidance for responding to consensual and non-consensual sharing of nude	29 – 30
8.4	Sexual Abuse (perpetrated by an adult or adults)	30
8.5	Harmful Sexual Behaviour	30 – 31
8.6	Exploitation and Serious Violent Crime	31
8.6.1	Child Crime Exploitation	32
8.6.2	Child Sexual Exploitation	32
8.7	Honor-based Abuse, including Female Genital Mutilation	33
8.8	Preventing Radicalisation	34-36
8.9	Domestic abuse	36
8.10	Neglect	36 - 37
8.11	Pupils at greater risk of harm	37 – 39
8.12	Behaviour and Attendance	39 – 40
8.13	Pupils who are educated off-site	41
8.14	Elective home education	41
8.15	Intimate Care	41
Part 4 – Policy		
9.1	How is information in this set of policy and procedures disseminated?	42
9.2	How do we ensure parents and carers understand the school's role in safeguarding	42
9.3	Use of school premises	42
9.4	Safer Recruitment Procedures	42 - 44
9.5	Online Safety	44 - 46
9.6	Safeguarding Supervision	46
9.7	Whistle-blowing	46
9.8	Training for Adults Working in Our School	47 - 48
9.9	Record-keeping	48
Appendices		
	Appendix 1 – Types of Abuse	49
	Appendix 2 – Safeguarding and Child Protection Concern/Incident Form	50 – 51
	Appendix 3 – Prompt sheet	52
	Appendix 4 – Low level concerns/ allegations incident form template	53 – 54
	Appendix 5 – Reading requirements	55
	Appendix 6 – Identifying support for pupils during partial school closure	56 - 57
	Appendix 7 – Individual Pupil/Student Risk Assessment	59 - 62

Quick Reference Contacts Guide

Title	Name	Contact Number
Headteacher & Deputy DSL	Samantha Dowdeswell	01793 527679 sdowdeswell@holycross.swindon.sch.uk
Deputy DSL	Matt Toogood	mtoogood@holycross.swindon.sch.uk
Deputy DSL	Elaine O'Neill	eoneill@holycross.swindon.sch.uk
Deputy DSL	James Green	jgreen@holycross.swindon.sch.uk
Deputy DSL	Rachel King	rking@holycross.swindon.sch.uk
Deputy DSL	Georgie McDowall	gmcdownall@holycross.swindon.sch.uk
Deputy DSL	Marie De Silva	msilva@holycross.swindon.sch.uk
Deputy DSL	Jayne Rutherford	jrutherford@holycross.swindon.sch.uk
Designated Teacher for Children Looked After	Elaine O'Neill	01793 527679 eoneill@holycross.swindon.sch.uk
Designated Lead for Prevent	Georgie McDowall	gmcdownall@holycross.swindon.sch.uk
Young Carers Lead	Elaine O'Neill	01793 527679 eoneill@holycross.swindon.sch.uk
Filtering and Monitoring	Tara Moran	tmoran@holycross.swindon.sch.uk
Link Governor for Filtering and Monitoring	Paul Kehoe	paul.kehoe@Cliftondiocese.com

Children's Social Care 'Contact Swindon'	01793 464646	
Emergency Service	contactswindon@swindon.gov.uk Telephone: 01793 464646 (during normal office hours which are 8.30am to 4.40pm Monday to Thursday, and 8.30am to 4.00pm Friday)	
Emergency Duty Service – Outside normal hours	The Emergency Duty Service (EDS) is available outside office hours on 01793 436699	
	Name	Contact
Headteacher	Samantha Dowdeswell	01793 527679
Chair of Governors	Paul Kehoe	paul.kehoe@Cliftondiocese.com
Safeguarding Link Governor	Paul Kehoe	paul.kehoe@Cliftondiocese.com
Local Authority Designated Officer (LADO)	LADO@swindon.gov.uk	01793 463854
Police	101 /999	
NSPCC Whistle-blowing Helpline	0800 028 0285	

1. Introduction - our school's commitment to safeguarding

This school takes seriously its responsibility to protect, safeguard and promote the welfare of the children and young people in its care.

"The welfare of the pupil is paramount." (Children Act 1989)

Our staff and governors are committed to safeguarding the pupils at this school and contribute to multi-agency working to keep pupils and students safe.

[Working Together To Safeguard Children](#) defines safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the [Children's Social Care National Framework](#).

All adults working in our school maintain an attitude of 'it could happen here'. We recognise that staff, because of their contact with and knowledge of children in their care, are well placed to identify abuse, neglect and exploitation and offer support to children in need.

This policy and set of procedures work in line with the relevant legislation, statutory guidance and take account of non- statutory guidance, all of which are listed in Section 2.

The school aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2014](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- The education and Training (Welfare of Children) Act 2021 [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](#)

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

Statutory Guidance

- [Keeping Children Safe In Education](#)
- [Working Together To Safeguard Children](#)
- [Children's Social Care National Framework](#)
- [Working Together To Improve Attendance](#)
- [The Prevent Duty Guidance](#)
- [Multi-agency statutory guidance on Female Genital Mutilation](#)
- [The Early Years' Framework](#)
- [Relationships Education, Relationships and Sex Education and Health Education](#)
- [Filtering and Monitoring Standards for schools and colleges](#)

Non-statutory Guidance

- [What To Do If You're Worried A Child Is Being Abused](#)
- [The Prevent duty: an introduction for those with safeguarding responsibilities](#)
- [Information-sharing: advice for safeguarding practitioners](#)
- [Children Missing Education](#)
- [Teaching Online Safety In School](#)
- [Safer Working Practice Guidance For Adults Working With Children and Young People](#)
- [Behaviour and Discipline in Schools](#)
- [Mental health and Behaviour In Schools](#)
- [Searching, screening and confiscation](#)

In addition, the school takes into account:-

- Regional guidance
- the procedures and practice of the local authority

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Definitions of Abuse (taken from Keeping Children Safe in Education)

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;

- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

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

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or '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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone."

Sexual Abuse

Involves forcing or enticing a child or young person 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 oral sex) 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, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Other useful definitions:

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

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

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

Children includes everyone under the age of 18.

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

- The local authority (LA);
- A clinical commissioning group for an area within the LA;
- The chief officer of police for a police area in the LA area;

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

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

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners.

The Governing Body, the Headteacher and the safeguarding team work together to ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Where there is a safeguarding concern, the governing body and the leadership team should strive to ensure that the child's wishes and feelings are taken into account when determining what action to take and which services to provide.

The school completes an annual audit of safeguarding for the local authority, in partnership with the link safeguarding governor. This self-evaluation is quality assured with a visit from an independent consultant. Where weaknesses or areas for development are identified, the Governing Body monitors the implementation and impact of identified actions to address these issues. The Headteacher provides a safeguarding report as part of the Headteacher's report to Governors.

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem

- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 Staff

Staff have a duty to respond to safeguarding and child protection concerns in line with the procedures laid out in this policy and in the statutory guidance – 'Keeping Children Safe in Education' Sept 2023. *'It is essential that everybody working in a school or college understands their safeguarding responsibilities.'*

They must also understand the role and identity of the designated safeguarding lead (DSL) and deputies. Staff must also be aware of:

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

5.2 The designated safeguarding lead (DSL)

The DSL takes responsibility for safeguarding and online safety.

The Designated Safeguarding Lead (and Deputy DSL/s in the DSL's absence) works in line with Annex C of KCSIE and is a senior member of staff, from the leadership team. This role carries a significant level of responsibility. See page 28 KCSIE for further detail.

The DSL is a member of the senior leadership team.

Our DSL is Mrs Sam Dowdeswell, Headteacher.

The DSL takes lead responsibility for child protection, online safety and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Designated Safeguarding Lead	Samantha Dowdeswell	01793 527679 07458 013416	sdowdeswell@holycross.swindon.sch.uk
Deputy DSLs	Matt Toogood Elaine O'Neill Georgie McDowall James Green Marie De Silva Jayne Rutherford Rachel King	01793 527679	mtoogood@holycross.swindon.sch.uk eoneill@holycross.swindon.sch.uk gmcdownall@holycross.swindon.sch.uk jgreen@holycross.swindon.sch.uk msilva@holycross.swindon.sch.uk jrutherford@holycross.swindon.sch.uk rking@holycross.swindon.sch.uk

When the DSL is absent, the deputies will act as cover.

If no-one from your safeguarding team is available, speak to the most senior member of staff on site. If this is you, please refer to 'Role of DSL'.

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

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

The DSL will also:

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

5.3 The governing board

The Governing Bodies have strategic leadership responsibility for safeguarding arrangements, ensuring that policies, procedures and training are effective and comply with the law (Part 2 KCSIE Sept 23).

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

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

Make sure:

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

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

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

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

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

5.4 The headteacher

The Headteacher has a duty to ensure that the policies and procedures adopted by the governing body and are understood and followed by all staff. This includes:

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction;
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

Communicating this policy to parents/carers when their child joins the school and via the school website

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

6. Confidentiality

All information about individual children is private, and should only be shared with staff that has a need to know.

All social services, medical and personal information about a child should be held in a safe and secure place which cannot be accessed by individuals other than school staff -CPOMS.

Parents/carers and children need to be aware that the school cannot guarantee total confidentiality and the school has a duty to report child protection issues.

Staff are always available to talk to both children and parents/carers about issues that are causing concern. The school encourages children to talk to their family about concerns. In some cases staff support the children to do so.

Parents/carers and children should feel reassured that only in exceptional circumstances will confidentiality be broken.

All children have a right to the same level of confidentiality irrespective of gender, race, religion, medical concerns and special educational needs.

Timely information sharing is essential to effective safeguarding.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

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

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. This should be referred to the police.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#)

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 7.7 and allegations of abuse against staff section 7.9.

Part 2 Procedures

7. Recognising abuse and taking action

7.1 Worried About a Pupil

See also: 'What To Do If You're Worried A Child Is Being Abused'

and the national multi-agency practice standards included in Working Together To Safeguard Children

Concerns about a child's welfare can arise in many different contexts; children may be abused in a family, by those known to them. They may be abused by an adult or adults, or another child or children within their family network; this is also referred to as familial abuse.

The risk of harm may come from outside the home (ROTH); this is also referred to as extra-familial harm. This includes:-

- Exploitation by criminal and organised crime groups or individuals (such as county lines and financial exploitation)
- Serious violence
- Modern slavery and trafficking
- Online harm
- Sexual exploitation
- Teenage relationship abuse
- The influences of extremism, which could lead to radicalisation

Children may experience extra-familial harm from other children and/or from adults; it may take place in school or other educational settings, within community/public spaces and/or online.

You may be worried about a pupil's welfare because you have seen or heard something. You may have noticed a change in their behaviour. You may have seen a mark on a pupil which worries you. You may be concerned about the safety or welfare of a pupil who is absent from school. You may not have received a direct disclosure, but you may have over-heard a conversation which worries you.

Where a pupil comes to speak to you directly and tells you information which may suggest they are at risk of abuse, neglect or exploitation, this is known as a disclosure. If a pupil discloses to you, you should:

- **Reassure** the pupil that they are being taken seriously and that they will be supported and kept safe
- **Listen** to and believe them. Allow them time to talk freely and do not ask leading questions;
- **Stay calm** and do not show that you are shocked or upset;
- **Reassure** the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- **Allow** the pupil to talk freely without interrupting
- **Reassure** the pupil that this is not their fault
- **Ask** questions **only if you need to clarify**, take care not to put words in their mouth by asking leading questions
- **Explain** what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- **Write up** your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it;
- Sign and date the write-up and **pass it on to the DSL**. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.5), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected;
- Not recognise their experiences as harmful;

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

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

You may not have received a direct disclosure, but you may have over-heard a conversation which worries you. You may have seen a mark on a pupil which worries you or noticed a change in behaviour. You may be concerned about the safety or welfare of a pupil who is not in school. You have a responsibility to follow the steps below:

Step 1

- Do you need to take immediate action to secure the safety of the pupil?
- If you are concerned that a pupil might be in immediate danger or at risk of significant harm you must act immediately and before the end of the school day. A decision may need to be taken about whether it is safe for the pupil to return home.
- Report your concerns directly to a member of the safeguarding team, as soon as possible. Where possible, this should be done 'face to face'.

In the first instance our Designated Safeguarding Leads:

Mrs Sam Dowdeswell

01793 527679

sdowdeswell@holycross.swindon.sch.uk

If the DSLs are unavailable, please report to our deputy DSL/s:

Mr Matt Toogood, Assistant headteacher

Mrs Rachel King

Mrs Elaine O'Neill

Mrs Georgie McDowall

Mr James Green

Ms Marie Silva and Mrs Jayne Rutherford

- If no-one from your safeguarding team is available, speak to the most senior member of staff on site. If this is you, please refer to 'Role of DSL'.
- If your concern relates to child-on-child abuse, refer also to Part 2 of this document and see also Part 5 of Keeping Children Safe in Education.

Step 2

- Record your concerns using CPOMS if you are teaching staff/LSP or the school's Safeguarding & Child Protection Concern/ Incident Form as soon as possible if you do not have CPOMS access on that particular day.
- MDSAs and Volunteers use the Incident Form.
- A copy of this can be found at the back of this policy and also in the staff room, and under 'S' on the Staff General File in the Safeguarding file

Guidance on recording your concern

- Record the full date and time, location, your name and role and keep your record as factual as possible.
- Use full names, not initials as we need to be able to identify who individuals are.
- Use the pupil's own words where applicable and enclose any direct quotes in quotation marks.
- Include what is it that you have seen/heard/noticed which concerns you?
- Has the pupil communicated that something is wrong? Verbally? Behaviour?
- Ensure your record is clear and factual. If you have included your opinion in your report, have you made it clear that this is your opinion?
- Include why what you have seen/heard/noticed concerns you? What are you worried will happen if this concern/incident is not responded to?

- Is there any context you may be aware of?
- Is this concern the first or have you had other concerns?
- Include any actions you have already taken.
- If marks or injuries have been observed, record these on a body map. (Do not take photographs)
- If a safeguarding/child protection concern/incident form is unavailable, handwritten notes can be made on a piece of paper. (This must be retained, even if the notes are subsequently written up / typed up onto a form).

Remember that records can be accessed by parents/carers and may also be used in multi-agency meetings and in criminal proceedings. Records should be clear, comprehensive and professionally written.

Step 3

- Include whether you have spoken to parents/carers about the concern/incident. Remember, you may need to seek advice from a member of the safeguarding team if you are unsure about whether speaking to the parent may increase the risk to the child. If the parent is the alleged perpetrator you must always seek advice from the safeguarding team before speaking to the parent/carer.
- The original concern form should be passed, in person, to the DSL/Deputy DSLs.
- Information should always be kept secure and confidential.
- Copies should not be retained by you.

Step 4

- You should receive feedback about what action, if any is being taken in response to your concern. A recommended timescale for this is within 24 hours. If you do not receive feedback or you feel that the situation is not improving for the pupil, you have a duty to follow up your concern with the DSL / deputy DSL.
- See section on Whistleblowing.

Additional consideration needs to be given to pupils with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

7.2 When Are Parents/Carers Contacted?

In line with 'Working Together To Safeguard Children' we recognise the importance of working in partnership with parents and carers as far as possible. Whilst collaborative relationships with parents and carers are important, we also recognise that the wishes and feelings of our pupils play a pivotal role in decision-making. Concerns about the welfare or safety of pupils will be discussed with the parent/carer, unless, having reviewed the information of concern, it is the view of the safeguarding team that this may increase the risk to the pupil. Following consultation with the school's safeguarding team, it may be the pupil's class teacher who makes contact with the parents/carers or it may be a member of the safeguarding team themselves. Our first priority is the pupil's welfare and therefore there may be occasions when concerns about a pupil means that we have to consult other agencies before we contact the parent/carer.

If a referral is to be made to Children's Social Care, the parent/carer will be contacted by a member of the school's safeguarding team and the information within the referral will be shared. There are some occasions when the school will be advised not to share the content of the referral with the parent/ carer as to do so may increase the risk of harm to the pupil.

Where reports are written about pupils as part of the child protection process, the school will provide opportunity prior to the conference to share the content with parents and carers.

7.3 The Designated Safeguarding Lead and Deputy DSL/s Procedures

The members of our safeguarding team work in partnership with a range of other agencies, including Local Partners, to keep pupils safe. This includes information-sharing, provision of reports and attendance at multi-agency meetings including child protection conferences and core groups.

What happens once a concern /disclosure has been reported to a member of the safeguarding team?

The DSL or deputy DSL will follow the steps below to respond appropriately to the concern and safeguard the pupil:

Step 1

- If there is concern that the pupil is in immediate danger contact Children's Social Care/Adult's Social Care via 'Swindon Contact' on 01793 464646 [Swindon Safeguarding Partnership](#). You may also consider contacting the police on 999. Go to section 'Making a referral to Social Care' (Section 7.5)

Step 2

- Contact the parent/s or carer/s of the pupil concerned, if this has not already been done. You may wish to take advice from Children's Social Care before contacting the parent/carer. If, having sought advice, you believe that sharing this information may increase the risk of harm to the pupil do not share with parents at this stage. You must document your decision-making here if the decision is made not to share information with parents/carers. In the majority of cases informing the parents/carers of the concern / disclosure which has been reported will not increase risk. Ask for any additional information from the parent/carer if applicable.
- Ensure that the parent/carer understands that a record will be kept by the school.

Step 3

- Refer to the local authority threshold document to support decision-making about what action is now required: [The Right Help at Right Time guidance.pdf](#)
- What are the risks to the child? Are they familial; posed by someone in the child's family? Are they extra-familial; posed by adults or peers outside of the home? (See Part 1 of KCSIE for further information).
- If the concern does not require immediate contact with Children's Social Care consider this latest concern within the context of any wider concerns / disclosures. This may mean further discussion with the pupil's class teacher and /or referring back to safeguarding or child protection records if they exist.

Step 4

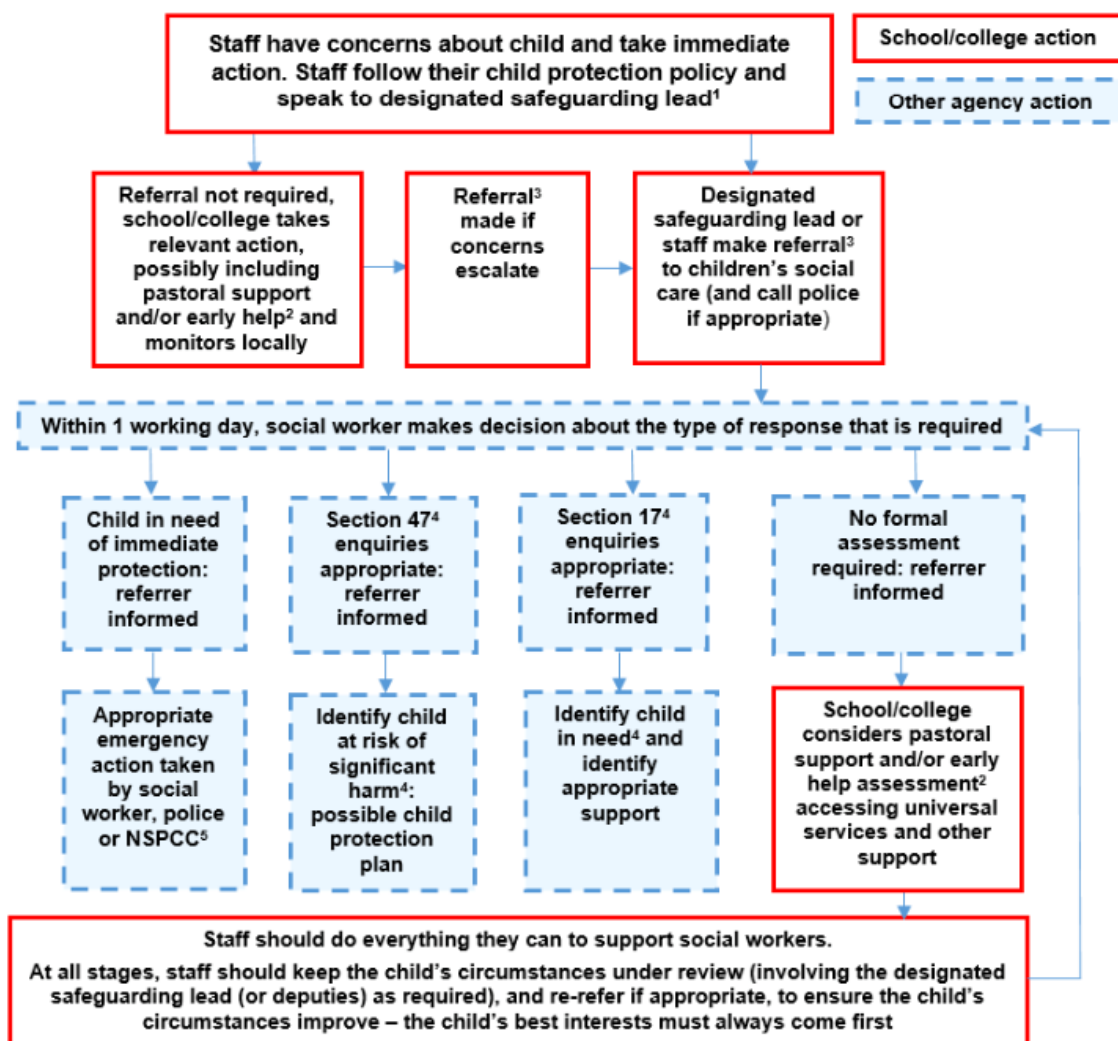
- Ensure that the member of staff reporting the initial concern has received feedback about actions and outcomes (if applicable).

Step 5

- The DSL should keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency, such as Children's social care or the prevent programme.
- Figure 1 below: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
- Note – if the DSL is unavailable, this should not delay action (see section 7.1 for what to do).

FIGURE 1

Actions where there are concerns about a child



Flowchart taken from 'Keeping Children Safe in Education' Sept 23

7.4 Next Steps - Early help assessment

See also pages 7 KCSIE and Working Together To Safeguard Children

What do we mean by Early Help?

Working Together To Safeguard Children defines early help as:-

'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.'

Effective early help relies upon local agencies, including education working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a pupil and their family which focuses on activity to significantly improve the outcomes for the pupil.

How are children and families identified for Early Help?

In our school staff are alert to the fact that early signs of abuse and/or neglect can be indicators that support is needed. Any child may benefit from early help, but staff should be particularly alert to a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and education plan)
- has a mental health need
- is a young carer
- is bereaved
- shows signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing from education, care or home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised
- is viewing problematic and/or inappropriate online content (for example linked to violence), or developing inappropriate relationships online
- has a family member in prison or is affected by a parent offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is mis-using drugs or alcohol themselves
- has returned to family home from care
- is at risk of honor-based violence such as female genital mutilation or forced marriage
- is a privately fostered child
- is persistently absent from education
- is missing education, or persistently absent from school, or not in receipt of full-time education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded from school and is in an alternative provision or pupil referral unit

What support is provided as part of the school's Early Help offer?

Effective early help relies upon local agencies, including education working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a pupil and their family which focuses on activity to significantly improve the outcomes for the pupil.

How does the Early Help process work?

<https://localoffer.swindon.gov.uk/media/33061/swindon-early-help-strategy-2017-2022-17.pdf>

7.5 Making a Referral to Children's Social Care for Support at Child in Need or Child Protection Level

See also Part 2 KCSIE and Working Together To Safeguard Children

- For some children and families early help support may not result in improved outcomes and increased safety for the child involved;
- A family may choose not to engage with the early help process and concerns may escalate as a result;
- The child may be at risk of significant harm.

At this stage, school safeguarding teams should refer to the local authority threshold guidance when making a decision as to whether a referral is made to Children's social care for support for:-

- 1.) a child who is unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of services, or the child is disabled – **Child in Need** (under section 17 of the Children Act 1989)
- or
- 2.) there is reasonable cause to suspect a child is suffering or likely to suffer significant harm – **Child Protection** (under section 47 of the Children Act 1989)

There are a number of additional 'frameworks' which can also be considered at this stage e.g. The Brook Tool, Neglect Framework, Graded Care Profile.

A referral may be required because:

- Early Help support has been offered but there is little or no evidence that this is having any impact for the pupil and their 'lived experience' is not improving;
- a pupil is suffering or is likely to suffer from harm.

In the first instance this should be made by telephone to 'Contact Swindon' on 01793 464646. It is useful to have any safeguarding / child protection records to hand. Following a telephone referral, you will be required to submit a written referral via a 'Request for Help and Support Form' within 24 hours.

Points to consider when completing a referral:

- Where possible include the 'voice' of the pupil, including any behaviours displayed which may indicate an unmet need.
- Provide a picture of what life is like for the pupil. What is their 'lived experience'?
- Is the risk posed familial or extra-familial? Have you included what else you know about the wider family, environment and context the pupil lives in?
- From the school's perspective, what are your worries for this pupil?
- Are there any safety factors? Are there any times when the school is less worried?
- An early help assessment is not a prerequisite for a referral but where one has been undertaken it should be used if a referral is made to children's social care.
- There are a number of additional 'frameworks' which can also be considered at this stage e.g. [the Hackett Continuum](#), the Brook Tool, Neglect Framework, Graded Care Profile

The completed referral will be shared with parents/carers, who will be asked to provide consent to the information being shared with social care. If consent is not given, or the referrer deems that it would place the pupil at risk to share the referral prior to reporting to social care, the information can still be shared where there is good reason to do so.

Outcome of referral

Members of the school's safeguarding team work in line with the statutory guidance included in Chapter 3 of Working Together To Safeguard Children and the local multi-agency safeguarding procedures, which outline next steps and decision-making following a referral to Children's social care.

Whenever there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, a strategy discussion should take place involving Children's social care, the police and health. The school should also be represented at this meeting.

See flowchart and Working Together To Safeguard Children

7.6 Case Resolution

In school

- If a member of staff does not see any improvement having reported a concern about a pupil, they have a duty to re-report to a member of the safeguarding team.

- If it is felt that the safeguarding team is not taking their concern seriously then this must be escalated to the Headteacher or the Chair of Governors (if the Headteacher is a member of the safeguarding team). See also section 'Whistle-blowing'.

External

- If a member of the safeguarding team feels a decision made by another professional in another agency is not in the pupil's best interests, they must discuss this further. In the first instance, this takes place directly with the professional involved to allow opportunity for decision-making to be discussed and clarified. (Pre-escalation)
- If pre-escalation fails to resolve the issues identified, the member of the safeguarding team should escalate within their own organisation (to the Headteacher if they are not in this role). The issue is then escalated to the professional's line-manager. (Escalation/Case Resolution)
- At all stages records should be kept.
- The Headteacher will ensure that the intention to instigate case resolution procedures is made explicit and in writing.

7.7 Support for The Pupil

Staff are in a position to identify concerns early, provide help for pupils, promote pupils' welfare and prevent concerns from escalating. Training is provided for staff to ensure they have an understanding of how children's experiences can impact on their mental health, behaviour, attendance and progress in school.

To promote pupils' welfare we provide the following support:

The child will:

- be allocated a dedicated member of staff (preferably from the Safeguarding team but not always);
- be offered support from an ELSA trained member of staff;
- have the opportunity to speak to the staff member if they need to in a safe space;
- have the opportunity to speak with any other member of staff if they ask;
- have the opportunity to decline the offer to speak with a member of staff.

The child can be referred to external support services if needed.

7.8 Record-keeping

Any member of staff, visitor or volunteer who has a concern about a pupil's welfare or receives a disclosure of abuse will make an accurate record, as soon as possible, noting what was said or seen, putting the event into context and giving the full date, time and location. Where possible this will be noted on CPOMS. If injuries or marks have been observed which cause concern, these should be recorded on a body map outline, giving an indication of size and whether there is a defined shape to the mark or injury.

Photographs should not be taken.

Any handwritten notes (not captured on CPOMS and Child protection concern/incident forms) will be retained, even if they are subsequently written up.

Chronologies

Individual pupil chronologies will be kept up to date on CPOMS and reviewed at regular intervals. All 'significant events' are captured on this chronology, including attendance at meetings, phone calls and emails in relation to safeguarding and /or child protection matters. This chronology also captures headline information about what action has been taken and the outcome of this action. The outcome should focus, where possible, on the pupil and indicate whether the situation is improving.

Case file review

Safeguarding and child protection files for individual pupils should be re-visited regularly to ensure any risk is being reduced and appropriate taken. It is good practice for this review to take place on a termly basis.

To ensure that all files are reviewed an overview of all pupils (where there are safeguarding / child protection concerns) is kept up to date. This is a 'live' document and reflects the numbers of pupil's subject to child protection, child in need or receiving early help support.

Transfer of records when a pupil moves to a new school

When a pupil moves school, safeguarding/child protection original documentation will be passed as soon as possible and confidentially to the receiving school, separate from academic records. Where possible, the DSL will arrange to meet the DSL of the new school to discuss the documentation. The receiving school is asked to sign to confirm receipt of the information and this confirmation is stored on file.

Record Retention

Our recording system, CPOMS archives records as children leave in Year 6. We keep secure digitised records until the child is 18 because:

- There could be a legal challenge around the child's care and decisions made;
- The child could be subject to later legal orders;
- There may have a SAR (subject access request) – from the parent, or the child;
- If the child became the subject of a serious case review, their history may be requested – police and other services may ask for a disclosure of school records to look at when a child became significantly at risk, or became a risk to others.

The school will retain records for pupils:

- Who have been withdrawn to be home-schooled, if there is an existing safeguarding /child protection file.
- Where they are the last educational provider for the pupil.

For children with additional vulnerabilities (i.e. LAC, CiN, CP, SEND, Medical) records are kept for 35 years after the child leaves school. The records are archived in secure storage, not accessible without authorisation. The record ceases to be a school record at this point and must only be accessed under a very limited set of circumstances.

Further guidance on the retention of records can also be found at <https://irms.org.uk/page/SchoolsToolkit>

7.9 Worried about the actions of an adult who works/volunteers with children

See also Part 4 KCSIE

You may be worried about the actions of an adult who is working/volunteering with children. The adult may be:

- an employee of the school;
- a supply teacher;
- an adult working with the school, employed by a third party (including staff working in afterschool clubs/lettings, alternative and enhanced provision and contractors);
- a volunteer.

You may have seen or heard something which makes you feel uncomfortable. You may be concerned that the adult's actions are contravening the school's staff code of conduct. You may be aware of a situation the adult is involved in, outside of school, which suggests they may not be safe to work/volunteer with children and young people.

All concerns must be reported following the steps below:

Step 1

- If you are concerned that a child might be in immediate danger or at risk of significant harm you must act immediately. Do you need to take immediate action to secure the safety of the pupil?

- Report your concerns directly to the Headteacher as soon as possible: Sam Dowdeswell (sdowdeswell@holycross.swindon.sch.uk)
- If the Headteacher is not contactable, report to the most senior member of staff on site.
- If your concerns are about the Headteacher report to the Chair of Governors directly: Alistair Flockhart (AFlockhart@holycross.swindon.sch.uk)

Step 2

- Record your concerns using the school's 'Concern' form (see Appendix 5), as soon as possible;
- **Staff should NOT record allegations or concerns about adults working or volunteering with pupils on electronic pupil record systems;**
- Remember to record the full date and time, your name and role and keep your record as factual as possible;
- If a concern/disclosure form is unavailable, handwritten notes can be made on a piece of paper. (This must be retained, even if the notes are subsequently written up onto a form).

Step 3

- Record what action you are taking, for example record the name of the member of staff you have reported to;
- The original concern form should be passed to the Headteacher or the Chair of Governors if the concern/allegation involves the Headteacher. Copies should not be retained by you;
- If the person you have reported the concern to does not take your concern seriously, you must escalate your concern to the Chair of Governors (if you are part of a Trust/Federation). Ultimately anyone can report a safeguarding concern about an adult working with children into the local authority, asking to speak to the Local Authority Designated Officer (LADO)/ Designated Officer For Allegations (DOFA). See Quick Reference Contact Guide on page 3.

The Role of the Headteacher Chair of Governors when dealing with low level concerns or allegations involving adults who work/volunteer with children

The Headteacher will consider the information in the report and initial consideration will be given as to whether this indicates that the person would pose a risk of harm if they continue to work in close or regular contact with children in their present position or in any capacity.

Is there evidence to suggest that the harms threshold has been met:

- the person has behaved in a way that has harmed a child, or may have harmed a child;
- the person has possibly committed a criminal offence against or related to a child; or
- the person has behaved towards a child or children in a way that indicates that he/she **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.

Criteria listed above taken from Part 4 of 'Keeping Children Safe In Education'

Allegations that meet the harms threshold

See also further guidance in detail included in KCSIE

If initial information in the report suggests that the threshold has been met, the Headteacher /Chair of Governors will follow Section 1 of Part 4 of KCSIE - 'Allegations that meet the harms threshold.'

Where the allegation relates to an adult externally employed/contracted, the Head /Chair of Governors will inform the employer of the allegation.

Step 1

- The Headteacher/Chair of Governors will contact the LADO immediately, before commencing any form of investigation. Schools are permitted to conduct basic enquiries, (see page 83 of KCSIE) to establish the facts, however care should be taken not to jeopardise any future police investigation.

Step 2

The LADO will decide on further action:

- strategy discussion/meeting; or
- advice and follow up from LADO; or
- no further action by the LADO after initial consideration and closure.

If further action is agreed, the LADO will agree with the police whether or not a strategy discussion/ meeting needs to take place. If it is agreed that the threshold has not been met for a strategy discussion/meeting, an allegations management meeting may be held. The main purpose of this is to ensure the safety of the children and ensure the process is concluded promptly, ensuring the accused staff member has adequate support.

At the conclusion of investigations, an outcome will be agreed by the LADO:

- Substantiated: there is sufficient evidence to prove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

A record of the outcome of all allegations involving the LADO is held.

At the end of the allegation process if a member of staff or volunteer is removed from their position for causing harm or posing a risk of harm or they leave whilst investigations are on-going, the school has a duty to inform the Disclosure and Barring Service via a referral.

Where a decision is made to dismiss or cease to use the services of a teacher because of serious misconduct, or they might have been dismissed or their services ceased had they not left first, the school will consider whether to refer to the Teaching Regulations Agency.

We understand, as a school, that if we know or have reason to believe that an individual is barred, we are committing an offence if we allow the individual to carry out any form of regulated activity.

Concerns that do not meet the harm threshold

See also pages 100-104 KCSIE

Creating an environment with a strong culture of safeguarding, where pupils are kept safe involves ensuring that **all** concerns about adults who work/volunteer with children are shared responsibly, with the right person, recorded and dealt with appropriately.

A low-level concern may be a sense of unease, a nagging doubt, or noticing that an adult appears to be contravening the school's staff /visitor code of conduct. It may include 'over-friendliness with a pupil/pupils, having a favourite pupil, engaging with a pupil on a one to one basis in a secluded area of the school.

Staff, volunteers and external visitors must share **all concerns which arise**, even if they do not believe the harm threshold has been met. Just because a concern does not meet the harm threshold does **not** mean it is insignificant.

Possible actions

- The Headteacher/Chair of Governors may still consider contacting the LADO for further guidance if required.

- The Headteacher/ Chair of Governors will consider what action needs to be taken to address the low-level concern/s, which may include additional staff training, mentoring and/or a verbal or written warning. Advice may be sought from the school's HR provider here.
- It is important that all low-level concerns are recorded, to identify whether a pattern of worrying behaviour is emerging. This chronology of concerns may trigger a referral into the LADO where a pattern emerges.

Code of conduct

Staff, volunteers and external visitors are provided with our school's code of conduct and sign to confirm that they have read and understand expectations about their behaviour.

Ensuring that this process is followed robustly helps keep children safe.

Unprofessional behaviour which breaches our staff code of conduct is addressed at an early stage and the individual supported.

Supporting the welfare of the child

Where a child has been harmed, there is immediate risk of harm or the situation is an emergency contact will be made with Children's Social Care and as appropriate the Police.

As a school we will support pupils as outlined on Page 17

Supporting the welfare of the adult at the centre of the concern/allegation

Employers have a duty of care for their employees. The Headteacher/ Chair of Governors must put in place support for the adult at the centre of the concern/allegation.

Record-keeping

All low-level concerns and allegations about adults who are working or volunteering with children should be recorded on the school's 'Low level concerns/ allegations incident form template' (Appendix 5)

Records are stored confidentially and securely and comply with the data Protection Act 2018 and the UK GDPR Act.

Allegations which meet the threshold

The following information is kept on file:

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

Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the enquiry. All other records should be retained at least until the accused has reached normal pension age or a period of 10 years from the date of the allegation if that is longer.

Further information can be found on the ICO website.

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

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

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

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

Low level concerns

The following information should be recorded:

- Details of the concern and the context in which the concern arose;
- Action taken;
- If advice was taken as to whether the LADO was contacted for guidance.

This information is retained until the individual leaves employment/volunteering role with the school.

Where a pattern of concerns emerges, these are recorded on a chronology. These are reviewed to decide whether the pattern of behaviour moves to concern to meeting the harms threshold, in which case it will be referred to the LADO.

Following an allegation or low-level concern

Consideration will be given as to whether there are areas of the schools safeguarding practice and procedure or wider cultural issues within the school which need addressing following an allegation or low-level concern. Where appropriate, policies will be revised or additional training provided to minimise the risk of this happening again.

Part 3 - Specific Safeguarding Themes

8. Safeguarding Themes

See also Annex B KCSIE

Knowing what to look for is vital for the early identification of abuse, neglect and specific safeguarding issues such as exploitation. If you are at all unsure you should **always** speak to the safeguarding team.

8.1 Child on Child Abuse

See also 40-41, Part 5 KCSIE and Annex B

We recognise that children are capable of abusing other children. This can happen both inside and outside of school and online. A child may not find it easy to report child on child abuse and we recognise that they might show signs or act in ways that they hope an adult will notice, including a change in behaviour. Even if there are no reported cases of child on child abuse, we recognise that abuse may still be taking place but not being reported. We understand that the pupil who is perpetrating the abuse may also be at risk of harm and we will make every effort to ensure that the perpetrator is supported appropriately.

Procedures in place to minimise the risk

- The school's ethos encourages pupils to raise concerns with staff, knowing that they will be listened to, believed and valued. Various 'sign-posts' are displayed around the school which remind pupils how to respond if they are worried about peer on peer abuse, e.g. displays in the school, posters advertising helplines e.g. Childline.
- Systems are in place for pupils to confidently report abuse, knowing their concerns will be taken seriously. At regular points throughout the school year discussions are had and reminders given about the different types of 'Trusted adults'. This is done in class, assemblies and in small groups where necessary.
- We deliver a Relationships Education and Health Education (Primary) curriculum in line with the DfE statutory guidance. This develops pupils' understanding of healthy relationships, acceptable behaviour and keeping themselves safe. This curriculum is broad, balanced and covers a range of safeguarding themes. It is progressive across the year groups. At regular points throughout the school year discussions are had and reminders given about the different types of 'Trusted Adults'. This is done in class, assemblies and in small groups where necessary.
- Staff receive regular training to ensure they know the signs and indicators which may suggest a pupil is at risk of child on child abuse and understand their role and responsibilities to report to the safeguarding team as soon as possible.
- Our school has a zero-tolerance approach to abuse and regular staff training ensures that incidents of child on child abuse are never passed off as 'banter', part of growing up or 'boys being boys'. All incidents of child on child abuse are reported to the safeguarding team.
- The school has a behaviour policy in place which is regularly reviewed and sets out the expectations about appropriate behaviour. Our policy makes clear that child on child is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Following an incident where sexually harmful behaviour has been identified, the safeguarding team will ensure that risk to siblings is considered.

Set out below are the different types of child on child abuse and the systems in place to respond to these.

8.2 Bullying (including Cyberbullying)

There is no legal definition of bullying. However, it's usually defined as behaviour that is:

- Repeated (although not always)
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, for example because of race, religion, gender or sexual orientation

This can include:

- physical assault
- teasing
- making threats
- name calling
- cyberbullying - bullying via mobile phone or online (for example via email, social networks and chat rooms on gaming platforms)
- racist and religious bullying: A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status;
- sexual, sexist and transphobic bullying: includes any behaviour, whether physical or non- physical, where sexuality is used as a weapon by boys or girls;
- homophobic bullying: targets someone because of their sexual orientation (or perceived sexual orientation);
- disablist bullying: targets a young person based on their disability, special needs or health needs. This can include manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.

Responding to concerns about bullying

Pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others, whether this is an isolated incident or a pattern of behaviours.

- A record of bullying incidents are recorded using CPOMS and monitored by the Headteacher. SLT will work with home and the child to modify behaviour, engaging ELSA support or nurture group as necessary.
- Anti-bullying week and our RHE programme educates pupils about the impact of bullying.
- Playground incidents are recorded and analysed to identify trends and data is shared with the local authority. This information is used to inform assemblies and ELSA work with children.
- Every year, children in years 1-6 participate in the NSPCC's Speak Out. Stay Safe programme, which teaches them an awareness of abuse, that it isn't ok and encourages them to speak out if they feel unsafe or worried.
- The school has a behaviour policy is regularly reviewed and sets out the expectations about appropriate behaviour. Our policy makes clear that child on child abuse is not acceptable, will never be tolerated and is not an inevitable part of growing up.

Set out below are the different types of child on child abuse and the systems in place to respond to these

8.3 Child on Child Sexual Abuse

See part 5 of KCSIE

This can include:

- Sexual violence and sexual harassment - Sexual violence and sexual harassment can occur between two pupils of **any age and sex**, from Primary, into Secondary and into College. **We recognise that 'it could happen here'**. It can occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and 'face to face' (both physically and verbally) and are never acceptable.

Sexual violence can include:

- Rape
- Assault by penetration
- Sexual Assault

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- Sexual 'jokes' or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- Inappropriate/unwanted touching
- Consensual and non-consensual sharing of nude and semi-nude images, videos and/or livestreams (also known as sexting or youth produced sexual imagery)
- Up-skirting

Child on child sexual abuse can also include:

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Initiation/hazing - refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group

8.3.1 Responding to concerns about child-on-child sexual abuse

Step 1

- Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted upon).

Step 2

- **Record** the incident using the school's safeguarding recording procedures and **report** to the DSL / deputy in line with safeguarding and child protection procedures, as soon as possible. Is information about the incident first hand or do other individuals need to be spoken to, to confirm?

Step 3

The DSL will consider the following:

- The wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and support they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children. A victim should never be given the impression that they are creating a problem, nor should they be made to feel ashamed for making a report. It will be explained that the law is in place to protect children/young people rather than criminalise them.
- Has a criminal offence been committed? If yes, contact the police (See also '**When To call the Police**' (NPCC)).
- Ages of pupils / developmental stage.
- Whether there is a power imbalance between the children.
- Whether the alleged incident is a one-off incident or there is a sustained pattern.
- Any on-going risks to the victim, other children, or staff.
- Other related issues and the wider context, including whether there is evidence of the victim/s being exploited, criminally and/or sexually.

To support our judgements about sexualised behaviours we refer to [the Hackett Continuum](#) and '[Brook Sexual Behaviours Traffic Light Tool](#)'.

Step 4

- If there is no evidence to suggest that a criminal offence has taken place the DSL will consider next steps, in discussion with parents/carers unless to do so would increase the risk to the pupils involved.
- If there is evidence to suggest that a criminal offence has taken place the DSL will follow the guidance in part 5 of KCSIE. Any report to the police will be in parallel with a referral to children's social care

This will typically involve:

- Considering support, including Early Help support for both the victim and perpetrator (does the perpetrator have unmet needs?)
- Making a referral to children's social care **if the victim** has been harmed, or is at risk of harm.
- Making a referral to children's social care **if the perpetrator** is at risk of harm / being harmed (under-lying welfare and safety concerns which may have triggered behaviours).
- Writing a risk assessment for pupils, who have been identified as being at increased risk of child on child abuse (considered for both the pupil perpetrating the abuse and the pupil who is the victim) to include protection and support. See Appendix 7 for template
- Considering targeted education about healthy relations for the perpetrator and any additional sanctions under the school's behaviour policy.

8.3.2 Additional guidance for responding to consensual and non-consensual sharing of nude and semi-nude images, videos and/or livestreams

Step 1

- Report to your DSL immediately.
- **Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.**
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Taken from UKCIS guidance.

Step 2

- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member who was initially made aware of the incident/concern and the leadership team.

The following risk factors will be considered:

- Significant age difference between the sender/receiver involved
- If staff recognise the pupil as more vulnerable than is usual (i.e. at risk)
- If the image is of a severe or extreme nature
- If the situation is not isolated and the image has been more widely distributed
- If this is not the first time the pupil has been involved in a sexting act
- If other knowledge of either the sender/recipient ^[1]_{USEP} may add cause for concern (i.e. difficult home circumstances)

Step 3

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

Step 4

- Interviews will take place with those involved.

Step 5

- Parents/carers should be informed at an early stage and involved in the process in order to best support the child or young person, unless there is good reason to believe that involving them would put the child or young person at risk.

Step 6

- Safeguarding records will be updated using the school's safeguarding recording procedures, including actions taken / not taken and the justification for these decisions (linked to the points above).

8.4. Sexual Abuse (perpetrated by an adult or adults)

"Sexual abuse involves forcing or enticing a child or young person 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 oral sex) 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, 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." *Working Together To Safeguard Children*.

Signs and indicators of sexual abuse

- Physical signs eg bruising, pain or soreness in the genital area
- Being afraid /avoiding a particular person
- Being withdrawn
- Self-harming
- Episodes of going missing
- Eating disorders
- Displaying sexualised behaviour or having sexual knowledge that's inappropriate for their age and stage of development.

Grooming is a process that involves the perpetrator building a trusted relationship with the child or children. Children can be groomed by a stranger or someone they know, for example a family member (intra-familial sexual abuse), friend or professional (extra-familial sexual abuse). Grooming techniques can be used to prepare a child for sexual abuse and exploitation (see also section 8.5 below) grooming can also be used to radicalise a child – (see also section 8.8 below)

Responding to concerns of sexual abuse

Step 1

- Immediate consideration should be given as to how best to support and protect the victim (and any other children impacted upon, including siblings)

Step 2

- **Record** the incident using the school's safeguarding recording procedures and **report** to the DSL / deputy in line with safeguarding and child protection procedures, as soon as possible.

The DSL will make a referral to Children's social care.

8.5. Harmful Sexual Behaviour

“Sexually harmful behaviour from children does not always occur with the intent to harm others. There may be many reasons why a child engages in sexually harmful behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. For this reason, consideration will always be given to how the child displaying the behaviour is supported, in addition to the 'victim' of the behaviour. This may include a referral to social care. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault / abuse.” Taken from Tri.X 'Peer on Peer Abuse' Briefing 198

To support our judgements about sexualised behaviours we refer to the '[Brook Sexual Behaviours Traffic Light Tool](#)' below. Where a behaviour is identified as amber or red our safeguarding procedures will be followed here, and a referral made to social care as appropriate, for both the pupil displaying the behaviours and also any pupil who has been involved and may have been harmed.



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

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.

● 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

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.

● 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 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.

8.6 Exploitation and Serious Violent Crime

See also Part 1 and Annex B KCSIE and the County Lines toolkit.

This school recognises that children can be exploited sexually (CSE) or criminally (CCE). CSE and CCE can affect children, both male and female and can involve children who have been trafficked. They may be at risk of or involved in serious violent crime.

8.6.1 Child Criminal Exploitation

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

The following can be indicators of CCE:

- Unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Changes in emotional well-being
- Misuse of drugs and alcohol
- Periods of time missing or regularly coming home late
- Children who regularly miss school or education or do not take part in education
- Carrying knives or weapons for a sense of protection from harm from others

CCE can include children being forced to shoplift or pickpocket, forced to threaten other young people, forced to work in cannabis factories, being coerced into moving drugs or money around the local area or across counties (County Lines).

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

- Being male
- Having been frequently absent or permanently from school
- Having experienced child maltreatment
- Involvement in offending such as theft

8.6.2 Child Sexual Exploitation

Child Sexual Exploitation occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited and believe they are in a genuine, romantic relationship.

Responding to concerns that a pupil might be being exploited

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate (including support, if applicable, for the pupil who is deemed to be 'perpetrating' the abuse.)

See also section above on Child on Child Abuse and 'When To call the Police' (NPCC).

8.7 Honour-based abuse, including Female Genital Mutilation

See also Annex B KCSIE, <https://www.gov.uk/guidance/forced-marriage> and multi-agency statutory guidance on Forced Marriage

Honour-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast-ironing.

Responding to concerns about honour-based abuse

Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can involve multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what action to take.

Our safeguarding procedures will be followed here and staff should speak to a member of the safeguarding team immediately if they suspect a child or young person is at risk of honour-based abuse. Safeguarding teams will contact children's social care/ adults social care for anyone 18 or above and local protocols will be followed.

Female Genital Mutilation (FGM)

See Annex B, Multi-agency statutory guidance on FGM and FGM factsheet.

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. This practice is often referred to as 'cutting'. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

Key points

- FGM is illegal in the UK. It is also illegal to take a British National or permanent resident abroad to undergo FGM or help someone who is trying to arrange to have FGM performed.
- FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.
- FGM is prevalent in 30 countries. These are concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East, and in some countries in Asia.
- FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. This practice is not required by any religion.

Risk Factors

The most significant factor to consider when deciding whether a girl or woman may be at risk of FGM is whether her family has a history of practising FGM.

In addition, it is important to consider whether FGM is known to be practised in her community or country of origin. It is important not to make assumptions that all girls from these communities are at risk. A parent

may request permission for their child to travel overseas for an extended period. This is sometimes requested leading into or out of a school holiday (often the summer break).

Responding to concerns about Female Genital Mutilation

If a girl has disclosed to you that she has been subjected to FGM or you have visual evidence of this, you must report it to the **police** (teachers are required to report known cases of FGM in girls under 18 to the police under the mandatory reporting duty October 2015).

If a direct disclosure has not been made and there is no visual evidence, but you have concerns that the pupil may have been subject to or at risk of FGM the school's normal safeguarding procedures will be followed here. This includes reporting your concerns to a member of the safeguarding team and putting your concerns in writing.

The DSL will follow the steps below to respond appropriately to the concern and safeguard the pupil:

Step 1

- Consider the information of concern. This may mean referring back to check whether there is any previous information of concern for the pupil.

Step 2

- Check whether there are any risk factors present for the pupil / family

Step 3

- Where it is deemed appropriate to do so, speak to the parent or carer about FGM. Be sensitive to language differences.

Step 4

- At this stage consideration should be given to make a referral to Children's Social Care. It is useful to have any safeguarding / child protection records to hand. Following a telephone referral, you will be required to submit a written referral within 24 hours.

See also:

FGM Helpline: 08000283550

Email: fgmhelp@nspcc.org.uk

Home Office Resource Pack: <http://www.gov.uk/government/publications/female-genital-mutilation-resource-pack>

8.8 Preventing Radicalisation

See Annex B and The Use of Social Media For Online Radicalisation

Prevent Duty Guidance and [*'The Prevent Duty: an introduction for those with safeguarding responsibilities*](#)

The Home Office Prevent Duty guidance defines radicalisation as 'the process of legitimising support for, or use of terrorist violence.' An individuals' susceptibility to radicalisation may be linked to their vulnerability. An individual can be vulnerable if they need special care, support or protection because of age, disability, or risk of abuse and/or neglect.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

(Definitions from the Government's Counter Extremism Strategy)

The following can be indicators of risk:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- advocating violence towards others

The internet provides children and young people with access to a wide-range of content, some of which is harmful. As a school we recognise that extremists use the internet, including social media, to share their messages.

Responding to concerns that a pupil might be at risk of radicalisation

As a school we recognise that we have an important part to play in educating children about extremism and recognising when pupils start to become radicalised. In our school the designated lead responsible for the delivery of Prevent is **Georgie McDowall**. The designated lead works in line with the statutory requirements laid out in the Prevent Duty guidance.

A school Prevent risk assessment is in place and is reviewed at least annually by the designated lead. This assesses how pupils and staff may be at risk of being radicalised into terrorism, including online. Where specific risks are identified an action plan is developed to mitigate the risk.

We ensure that through our school vision, values, rules, curriculum and teaching:-

- we limit exposure to radicalising narratives, both online and offline, including our work in line with the [Filtering and Monitoring Standards](#).
- We ensure that through our school vision, values, rules, curriculum and teaching:
- we promote tolerance and respect for all cultures, faiths and lifestyles.
- the governing body also ensures that this ethos is reflected and implemented effectively in school policy and practice.
- pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others.
- visitors who are invited to speak to pupils will be informed about our ethos and safeguarding procedures and relevant vetting checks are undertaken. We undertake due diligence to ensure that visiting speakers are appropriate. Speakers will be supervised at all times and will not be allowed to speak to children without a member of staff being present.

The Prevent Duty

As with other safeguarding risks, staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include our DSL making a referral using the agreed local Prevent referral procedures.

All referrals will be made to Preventreferrals@wiltshire.police.uk by our DSL where it will be reviewed, there may be a need for a multi-agency Channel panel where information from partners is reviewed and the referral considered, level of vulnerability agreed and consider what support may be needed.

Holy Cross' DSL will provide information and attend Channel Panels where they are requested to do so. Holy Cross' DSL will also consider whether it is appropriate to share information with any new education setting in advance of the child leaving our school. This is to ensure the new setting are able to continue supporting the child through the Channel programme.

Channel is a multi-agency approach to provide support to individuals who are susceptible to being drawn into terrorist related activity.

Each local authority has a panel and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be susceptible to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The DfE helpline can be contacted for advice 020 7340 7264 (this should not be used in cases of emergency) or via the e mail counter.extremism@education.gsi.gov.uk

See also: Keeping Swindon Safe

The Prevent duty: Safeguarding from radicalisation

https://www.swindon-csp.org.uk/info/9/swindon_csp/13/the_prevent_duty_safeguarding_from_radicalisation#:~:text=Call%20the%20local%20Prevent%20team,advice%20regarding%20a%20Prevent%20concern

8.9 Domestic Abuse

See Part 1 and Annex B KCSIE

'Abusive behaviour' is defined in the Domestic Abuse Act (2021) as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and '[personally connected](#)'.

It can encompass a wide range of behaviours and may be a single incident or a pattern of behaviours. The impact of domestic abuse on children and young people is detrimental and long term and can affect their health, well-being and ability to learn. Children and young people may see, hear or experience the effects of abuse.

Responding to concerns that a pupil might be subject to or witnessing domestic abuse

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate.

Where a member of staff or regular volunteer/visitor has a concern about a pupil/student in this situation or where a disclosure has been made to an adult working in the school, the school's normal safeguarding and child protection procedures will be followed.

The school is registered with the Operation Encompass reporting tool. Any incidents of Domestic Abuse reported to the school are recorded on a CPOMS or concern form

8.10 Neglect

Working Together To Safeguard Children defines neglect as :-

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

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

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

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

The following is a summary of some of the indicators that may suggest a child is at risk of or being neglected:

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Refer to Swindon's Neglect Framework: [Neglect framework and practice guidance - Swindon Safeguarding Partnership](#)

8.11 Pupils at greater risk of harm

8.11.1 Pupils with disabilities, special educational needs (SEN) or certain health conditions

As a school, we recognise that pupils who have disabilities, SEN or certain health conditions can face additional safeguarding and child protection challenges.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's disability, SEN or health condition/s without further exploration
- pupils can be disproportionately impacted upon by things like bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

The Swindon Neglect Framework is used by the DSL to assist in the identification of child neglect and identify when there is a concern that the quality of care a child is receiving is leading to their developmental needs being neglected.

[SSP neglect framework and practice guidance - Swindon Safeguarding Partnership](#)

The DSL has also completed the Graded Care profile 2 (GCP2) training. This is an assessment tool to assess neglect. The GCP2 assessment and the Neglect Framework can also be used to support referrals and in reflective supervision meetings.

8.11.2 Pupils who need a social worker (including Children In Need, Children on a Child Protection Plan and Children Looked After)

Children may need a social worker due to safeguarding or welfare needs. They may need this help due to abuse, neglect and complex family circumstances. A child's experience of trauma and adversity can leave them vulnerable to further harm, as well as educationally disadvantaged, facing barriers to:

- attendance
- learning
- behaviour
- mental health

As a school we ensure that all staff working directly with children/young people have a knowledge and understanding of the impact of adversity and trauma on children's mental and physical health, development and life chances. We understand that children can communicate an unmet need through their behaviour, whether this is challenging and disruptive or quiet and withdrawn. **Our school behaviour policy reflects this and includes the ways in which we respond in these situations.**

Teaching staff are supported by the members of the safeguarding team to maintain high aspirations for these children, identifying the challenges these children may face and making adjustments to teaching and learning to best support them.

The designated teacher for looked after children and previously looked after children is **Elaine O'Neil**. The school staff work with multi-agency professionals, including the Local Authority Virtual Schools Head, to ensure that prompt action is taken when necessary to safeguard these children. We recognise these children are a particularly vulnerable group.

Appropriate staff are provided with information in relation to their legal status and contact arrangements, as well as information about the child's care arrangements.

8.11.3 Pupils who are lesbian, gay, bi-sexual or transgender (LGBT)

As a school we recognise that whilst being LGBT is not in itself an inherent risk factor for harm, children who are LGBT can be targeted by other children. This can also be the case for children who are perceived by other children to be LGBT. Our staff recognise the importance of all children and young people having a trusted adult in school they can talk to and we endeavour to support all pupils to identify at least one trusted adult in school they can share concerns with if they don't feel safe.

8.11.4 Pupils with mental health issues

Where children have suffered abuse and neglect, or other potentially traumatic experiences this can have a lasting impact throughout childhood, into adolescence and into adulthood.

Regular safeguarding training ensures that staff are aware of how these children's experiences can impact on their mental health.

The following can be indicators of risk:

- self-harm

- noticeable weight loss or gain
- change in personality e.g. mood swings
- frequently missing lessons
- social isolation
- lethargy and disinterest
- tearfulness or appearing anxious
- lack of focus in class
- change in educational performance

The school will make referrals to the Child and Adolescent Mental Health services (CAMHs)

We have 2 staff members trained as Emotion Literacy Support Assistants which staff can access for support and small group or 1:1 work.

Children are encouraged to articulate their feelings and be open and honest about their mental health. This is promoted through whole school assemblies, class and group work where appropriate. School acknowledges that it's ok to not be ok.

A range of staff have completed mental health first aid awareness training.

8.11.5 Self-harm

If a child is suspected to be self-harming or there is evidence to show that self-harm is taking place, we will refer to TAMHS for specialist support. We will work very closely alongside our TAMHS Outreach Worker to make sure the child is supported as much as possible. Parents will be kept informed throughout this process.

8.12. Behaviour and Attendance

As a school we recognise that there can be links between safeguarding and child protection concerns and:

- incidents of disruptive and challenging behaviour
- poor attendance

8.12.1 Behaviour

We understand that children can communicate an unmet need through their behaviour, whether this is challenging and disruptive or quiet and withdrawn. Our school behaviour policy reflects this and includes the ways in which we respond in these situations.

See also the school's pupil behaviour policy.

Physical Intervention

Where physical intervention is required to keep a pupil safe the school will respond in line with the DfE guidance [DfE guidance 'Use of reasonable force'](#).

As a school we may intervene to:

- remove a disruptive pupil from the classroom where they have refused to follow an instruction to do so;
- prevent a pupil behaving in a way that disrupts a school event or a school trip or visit;
- prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a pupil from attacking a member of staff or another pupil, or to stop a fight in the playground; and
- restrain a pupil at risk of harming themselves through physical outbursts.

All incidents of physical intervention are recorded in the school's bound book and reported to parents/carers. Where a pupil has safeguarding /child protection records in place, information about incidents of positive handling will be cross-referenced. The bound book can be found in the Headteacher's office.

Following all incidents where physical intervention is required we routinely check the well-being of the pupil after the incident. This includes asking if they have been hurt.

If information suggests that a pupil has been hurt during an incident of physical intervention the Headteacher will be informed and contact will be made with the LADO.

Where pupils require regular handling and intervention a positive handling plan will be put in place. The pupil, together with the parents/carers will be involved in this process.

A team of staff have completed Team Teach training on the use of de-escalation and physical restraints. These staff can be called upon to manage a situation by other staff who have not been trained.

8.12.2 Attendance

See also [‘Working Together To Improve Attendance’](#)

See also the local authority’s guidance on ‘Children Missing Education’

As a school we recognise the importance of pupils attending school regularly. Where pupils are persistently absent from school, this could be a possible indicator of neglect, abuse or exploitation.

Any unexplained absence is followed up on the first day of absence. Where possible, we hold more than one emergency contact telephone number for each pupil/family.

Pupil attendance is monitored. The school monitors attendance weekly, monthly and termly. We recognise that children with poor attendance or missing from education may be more vulnerable and potentially are exposed to higher degrees of risk. Attendance information is therefore considered within the wider remit of safeguarding and child protection. Staff are aware that episodes of unexplained absence could indicate safeguarding concerns or the need for early help support.

Attendance procedures during partial school closure

As a school, we recognise that children with poor attendance or missing from education may be more vulnerable and potentially are exposed to higher degrees of risk. Attendance information is therefore considered within the wider remit of safeguarding and child protection. Staff are aware that episodes of unexplained absence could indicate safeguarding concerns or the need for early help support. We recognise the importance of pupils attending school regularly.

Any unexplained absence is followed up on the first day of absence. The admin team will attempt to make contact with the parents/carers to ascertain why the child is absent. If contact is not made, the DSL will be informed. If the child has a safeguarding history, the DSL will contact other relevant professionals.

CPOMs is used to monitor and record children whose attendance is causing concern. Pupil attendance is monitored by the Headteacher and analysed. Where possible, we hold more than one emergency contact telephone number for each pupil/family.

If a child’s attendance drops below 85%, the following procedures will be adhered to:



All children who have been flagged as persistent absentees to be allocated to members of SLT as a caseload. When these children are not in school, SLT will ring home to follow up on this. SLT will decide on next steps for individual children (these children will already be referred to the EWO). This may include;

- A face-to-face meeting;
- EWO recommendations;
- Creating a joint support plan;
- Early Help.

8.13. Pupils who are educated off site

Where pupils are attending off-site alternative or enhanced provision, it is our responsibility to ensure that they continue to be kept safe. Quality assurance of any provision used by our school is completed prior to the placement of a pupil. This includes:

- review of the provision's safeguarding and child protection procedures;
- a visit to the site;
- a letter of assurance to confirm that all staff working at the alternative provision have had the appropriate recruitment checks;
- information about issues which the pupil attending the site might be at risk of, to inform an effective risk assessment.

For each day that the pupil attends the off-site provision contact is made by **Elaine O'Neil** to ensure they have arrived safely. This process also applies where a pupil has been excluded from school, including fixed term exclusions. Contact will be made with a parent or carer to confirm their safety on each day of the exclusion.

8.14. Elective Home Education

Where a parent/carers has expressed an intention to remove their child from school with a view to educating at home, we will endeavour to co-ordinate a meeting with the parents (and professionals as appropriate, including an LA representative) to ensure parents/carers have considered what is in the pupil's best interests.

We have a statutory duty to inform the local authority when a pupil is removed from our roll. Where a child has an Education and Health Care plan the local authority will need to review the plan, working closely with parents and carers.

8.15. Intimate Care

See also staff Code of Conduct

Intimate care includes any tasks that involve the dressing and undressing, washing including intimate parts, helping someone use the toilet, changing nappies or carrying out a procedure that requires direct or indirect contact to an intimate personal area. Staff administering intimate care are required to record this using the agreed protocols laid out in our intimate care policy.

Children with ongoing intimate care needs have an individualised Care Plan. Children who need intimate care because they have had a toileting accident will be supported by two members of staff.

Staff should log all incidents of intimate care on CPOMS, using the medical category. Parents should also be informed. Where a child has had a toileting accident but hasn't needed any intimate care, the incident should still be logged on CPOMS, making it clear that no intimate care was needed.

Part 4 – Policy

9.1 How is information in this set of policy and procedures disseminated?

- Our staff induction programme includes a safeguarding section and new staff are asked to read the safeguarding policy and procedures. This also applies to Governors and Trustees
- Visitors, volunteers and external staff, including supply teachers, who visit our school are asked to read a visitors' code of conduct, which includes procedures for what to do if they have concerns about the safety of a pupil or concerns about the actions of an adult working/volunteering with children.
- Our safeguarding policy and procedures are re-visited on an annual basis and time is set aside for staff to re-read the document. In order to check staff understanding of the content. We look at specific case relative to our community. Staff have access to Flick training and regular updates are given during staff meetings and training sessions throughout the year.

In addition to reading and understanding the school's safeguarding and child protection policy and procedures, staff are required to read:

- Keeping Children Safe In Education
- child protection and safeguarding policy,
- staff code of conduct,
- behaviour policy,
- online safety policy,
- mobile phone policy
- the safeguarding response to children who go missing from education.

Staff are asked to sign to confirm their understanding and accept responsibility for following up any questions or queries they have arising from reading this document (with a member of our safeguarding team).

9.2 How do we ensure parents and carers understand the school's role in safeguarding pupils?

- This school is committed to helping parents/carers understand its responsibility for the welfare of all pupils and our duty of care. The policy and procedures are available to parents and carers via the school website and a paper copy can be requested by contacting the school office.
- The school website also provides access to a number of useful resources for parents and carers. These can be found in the 'Safeguarding' tab of the school's website.
- During pupil induction meetings for parents and carers information will also be discussed about the school's safeguarding responsibilities.

9.3 Use of school premises

See also ['After-school clubs, community activities and tuition: safeguarding guidance for providers](#)

Where external organisations use the school premises, both within the school day and outside of school hours, the Governing Body has a responsibility to:

- seek assurance that the organisation concerned has appropriate policies and procedures in place in regard to safeguarding pupils. This includes checking that the organisation's safeguarding policy is fit for purpose and includes procedures for reporting concerns about adults who may work/volunteer with children.
- ensure that the appropriate level of safer recruitment checks have been completed on staff working for the organization.

9.4 Safer Recruitment Procedures

See Part 3 KCSIE

This school works in line with Part 3 of Keeping Children Safe in Education.
DBS checks completed on all staff and regular volunteers

- An enhanced DBS certificate, which includes barred list information, is required for any staff who will be engaging in regulated activity (working unsupervised with children). This is required for any staff employed since 2002. Prior to this staff were checked against List 99. Following completion of the DBS check, we require the individual to provide the original DBS certificate in person for checking, in addition to receiving the electronic confirmation from the service we use for the check.
- Identity checks are completed, together with proof of right to work in the UK
- Qualifications are checked
- If an individual has lived or worked outside of the UK an overseas police check / certificate of good conduct may be required (*see part 3 KCSIE*)
- Right to work checks are completed on all staff.

In addition, staff who have a teaching role will be checked, via the DfE Secure Access Website, for

- qualified teacher status
- prohibition check
- section 128
- completion of induction
- teacher not subject to a conditional offer/suspension

Online searches

An online search is completed for all short-listed candidates who apply to work in our school.

A basic online search will be used to identify any publicly available information of concern which:-

- could pose a safeguarding risk to children /young people
- cause damage the reputation of the school

Where information of concern is identified, this will be discussed with the candidate before a decision is made about suitability for the role being advertised. A record is made of the check and any subsequent actions required, along with the outcome.

Visitors and externally employed staff

Where staff from external organisations are working with our pupils, we ensure that the letter of assurance received confirms that the relevant checks are in place, including a barred list check if the individual is working in regulated activity. Visitors are asked to provide proof of identity and if required, DBS information.

Green = staff lanyard - DBS check complete and can move around the school without being escorted

Yellow = visitor lanyard – visitor with a seen DBS that can move around the school without being escorted

Red = no DBS check so must be escorted by a member of school staff at all times.

Black = Governor of the school lanyard with a DBS

Single Central Record

The school maintains an up-to-date single central record of all safer recruitment checks. This is in line with the requirements as set out in Part 3 of Keeping Children Safe In Education.

The Headteacher monitors this record termly and ensures it is in line with statutory requirements.

Induction of new staff

Following appointment, the school offers new staff a programme of safeguarding and child protection induction. This includes:

- Face to face training with a member of the Safeguarding Team, CPOMS and contextual information about safeguarding at Holy Cross;
- A paper copy of the Safeguarding Policy (including KCSIE Part1);
- A paper copy of the school's staff code of conduct;
- A paper copy of the pupil behaviour policy;

- The safeguarding response for children missing in education (included within our attendance policy);
- A copy of the school's online safety policy and acceptable use agreement;
- Links to online training (Prevent and FGM).

Childcare Disqualification Checks

[The 'Disqualification Under the Childcare Act 2006'](#) states that:

'Schools are responsible for ensuring that anyone who falls within the relevant categories of staff described in the [staff covered](#) and [staff who may be covered](#) sections is made aware of the legislation. Schools must make these staff aware of what information will be required of them and how it'll be used to make decisions about disqualification. Schools are free to decide how to bring these requirements to the attention of their staff. As a means of making staff aware of their duty to provide such information, they may, for example, choose to include a section in the school's safeguarding policy, or another policy document, or by means of an addition to new staff members' contracts of employment. Schools should draw this guidance to the attention of their staff and the information provided by Ofsted referenced in this guidance.'

This information is given to staff as part of their contract of employment and is recorded on the SCR.

9.5 Online Safety

See our school's Online Safety Policy

See also Part 2 KCSIE

See also ['Teaching Online Safety In Schools'](#) (non-statutory guidance)

Technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

Children can abuse their peers online, this can take the form of abusive, harassing and misogynistic messages, the consensual and non-consensual sharing of indecent images and the sharing of abusive images and pornography, to those who do not want to receive such content.

Responding to online safety concerns

Staff will follow our safeguarding procedures as outlined in Part 2 of this document. Staff should also be aware of the additional guidance in Part 3 of this document under 'child on child abuse, where additional guidance is provided, in relation to responding to concerns about the sharing of indecent images via mobile devices.

What are the school's responsibilities around online safety?

This school recognises:

- the increasing role technology has to play in education and children's daily lives;
- the wide-range of content which is available to children via the internet;
- that alongside the benefits of technology, there are also risks;
- the importance of delivering a broad and relevant online safety curriculum which provides progression across year groups;
- that delivery of this curriculum must be provided via regular lessons, which take place throughout each term;
- the importance of keeping up to date with the tools, apps and devices children are using so that the curriculum which is offered is meaningful;
- that online safety must be reflected in all relevant school policies.
- its responsibility to work in line with the [Filtering and Monitoring standards](#) and takes all reasonable action, to limit children and young people's exposure to the risks from the school's IT system.

What our online safety curriculum offers

- Our online safety curriculum covers four aspects of risk – content, contact, conduct and commerce (see KCSIE for definitions);
- Key online safety messages (such as Childnet's SMART rules) which are reinforced at every opportunity across the curriculum, in assemblies, RSHE lessons and via our Purple Mash program;

- Pupils are taught in all lessons to be critically aware of the materials and content they access on-line and understand that not everything they see online is true;
- Pupils are supported in building resilience to radicalisation. A safe environment is provided for debating controversial issues and helping them to understand how they can influence and participate in decision-making;
- To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

Filtering and monitoring

See also:-

Part 2 KCSIE for further information

Our Online safety policy

As part of the work we do to provide pupils/students with a safe environment in which to learn, we ensure that we have appropriate filtering and monitoring systems in place. Harmful and inappropriate content is blocked without unreasonably impacting on teaching and learning.

We work collaboratively to keep pupils/students safe in the online world.

- Governing bodies and proprietors have responsibility for ensuring the school has appropriate filtering and monitoring systems in place, taking into account the age of our pupils and those who are potentially at greater risk of harm. We have a named governor for filtering and monitoring in our school (see quick reference guide at front of policy).
- Senior leaders, including the DSL have an awareness and understanding of the systems in place. An annual review of online safety takes place, including review of filtering and monitoring systems. We use Securly Safety filtering system.
- These systems are checked fortnightly (monitoring) and termly (filtering).
- Staff have an awareness of provisions in place and know how to respond when concerns are identified. Staff are provided with online safety training, at induction and at regular intervals.
- Within the four key areas of risk (Content, Contact, Conduct and Commerce), pupils/students are taught about the steps they should take if they identify illegal, inappropriate or harmful content online.

Use of mobile technology

At Holy Cross Catholic Primary School, we recognise that mobile phones, including smart phones, are an important part of everyday life for our pupils, parents and staff, as well as the wider school community.

We, as a school, recognise that cyber-bullying is becoming more prevalent amongst primary school aged children due to the increased use of mobile phones with cameras, tablet computers and other 'smart' devices. Mobile phones today often come with high quality cameras and internet capabilities. These features enable users to take high quality pictures. These can then be sent instantly to other mobile phones or posted online on social networking sites. There is the potential for camera and smart mobile phones to be misused in school. They may become an instrument of cyber-bullying or harassment directed against pupils and staff (see Mobile Phone Policy, Online Safety Policy and Code of Conduct documents for children and staff).

Use of technology during partial school closure/lockdown

This school recognises:

- the increasing role technology has to play in education and children's daily lives
- the wide-range of content which is available to children via the internet
- that alongside the benefits of technology, there are also risks

For those who are not physically attending school during partial school closure, we recognise that these pupils will be spending increased time online, either participating in school work, taking part in live streaming of lessons and/or as part of extended 'free-time.'

We recognise that this will pose increased risk to children, including:

- Grooming
- Exploitation, both criminal and sexual
- Radicalisation
- Child on child abuse, including cyber-bullying
- Sexual harassment

All staff who interact with pupils/students, including remote interactions, will continue to be vigilant and look out for signs that a child's safety and welfare might be at risk. Further guidance to keep pupils/students and staff safe when working remotely can be found in [Safer Working Practice](#).

In addition, pupils are sign-posted to age-appropriate practical support should they have worries or concerns whilst online. Links to support are available via our school website and include:

- UK Safer Internet Centre Hotline
- Child Exploitation and Online Protection Centre

9.6 Safeguarding Supervision

All staff working in this school have a responsibility to safeguard the children in their care. Staff can only achieve this effectively if they:

- are clear about what is expected of them
- have the skills, knowledge, behaviours, values and attitudes to carry out their role
- are fully supported in their role and managed effectively

Safeguarding supervision is available for any member of staff as required. Members of the safeguarding team receive termly planned safeguarding supervision.

9.7 Whistle-blowing

This school expects the highest standards of conduct from all employees and governors and will treat seriously any concern raised about illegal or improper conduct. The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- malpractice or ill treatment
- a criminal offence
- suspected fraud
- disregard for legislation, particularly in relation to health and safety
- a breach of any legal obligation, code of conduct or protocol
- a concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed, a reasonable belief is sufficient. The employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.

Staff and volunteers are encouraged to raise concerns about poor or unsafe practice and potential failings in the school's safeguarding regime via:

- the staff handbook;
- the staff code of conduct;
- the visitor's/volunteer's code of conduct.

In the first instance, unless the employee reasonably believes their Headteacher to be involved in the wrongdoing, any concerns should be raised with the employee's Headteacher. If he/she believes the Headteacher to be involved, then the employee should proceed straight to the Chair of Governors.

Where a member of staff feels unable to raise a concern with either of the individuals identified above the NSPCC whistle-blowing Helpline is available to them.

9.8 Training for Adults Working/Volunteering in our School

We are committed to ensuring staff and volunteers know and understand:

- the signs and symptoms of abuse, neglect and exploitation;
- how to identify pupils who may benefit from early help;
- when to share information
- their responsibility for referring concerns to the designated safeguarding lead / deputy;
- the procedures for reporting safeguarding /child protection concerns about adults working with children (allegations)

Staff training

The following training is provided at induction and subsequently on a regular basis to all staff annually:-

- Safeguarding and child protection training
- Online safety training
- Prevent training

Governors/Trustees are provided with strategic safeguarding training at induction and as subsequent updates. This training includes a focus on the safeguarding roles and responsibilities of all governors/trustees and equips them to provide strategic challenge to test and assure themselves that safeguarding policies and procedures are effective.

We are committed to ensuring staff and volunteers know and understand:

- the signs and symptoms of abuse;
- how to identify pupils who may benefit from early help;
- their responsibility for referring concerns to the designated safeguarding lead / deputy;
- the procedures for reporting safeguarding /child protection concerns about adults working with children (allegations)

Other regular volunteers have face-to-face training with the DSL.

Updates

In addition to formal training, all staff receive regular opportunity to update their knowledge and understanding and ensure they are aware of new and emerging threats.

These updates include a focus on:

- Sexual abuse
- Child on child abuse, including sexual violence and harassment
- Early Help
- Trauma and adversity
- Radicalisation and the Prevent Duty
- Honour-based abuse, including Female Genital Mutilation
- Exploitation, including child criminal exploitation and child sexual exploitation
- Child mental health
- Parent mental health
- Domestic abuse
- Online safety, including filtering and monitoring
- Forced marriage and honour-based violence
- Child-trafficking
- Children missing education and absent from education

These are delivered by staff meeting discussion, online training modules, safeguarding scenarios and newsletters.

These happen at least annually.

Additional training for Designated Safeguarding Leads and deputy DSLs

The statutory requirement for DSLs and deputy DSLs is to renew training every 2 years. We work in line with this requirement. Our deputy DSLs have completed advanced training to the same level as the DSL, in line with the requirements of our Local Authority.

In addition, the members of our safeguarding team complete:

- FGM training;
- additional Prevent training in line with statutory requirements (2 yearly).

9.9. Record-keeping

See also section 7.8

Safeguarding records, including records relating to staff and the SCR, are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information and providing access to official information.

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Appendix 2: Safeguarding and Child Protection Concern / Incident Form

CONFIDENTIAL

Date:		Name and role of person completing form	
Time:		Date and time read by DSL / Deputy DSL	
Name of pupil:		DOB:	
Location (if applicable)			
<u>What have I seen/heard/noticed which concerns me?</u>			
<u>What am I worried about?</u>			
<u>Is this concern linked to any previous concerns I have reported?</u>			
<u>Action I have taken</u>			
To be completed by a member of the safeguarding team			
<i>Include reference here to other members of the safeguarding team you may have discussed the case with</i>			
Discussion of next steps agreed with:			
Record of discussion with another professional, external to the school (giving full name/ role and agency)			
Detail of decision / action agreed by DSL or deputy:			

Has the local authority threshold guidance been referred to at this point? Yes / No

Has the person who reported the initial concern been provided with feedback? Yes / No

Reason(s) for this decision or action by DSL or deputy:

Does the pupil need to be monitored? Yes/No

If yes, when will the case be reviewed?

Is Early Help support appropriate? Yes / No

Reason for decision

Is a referral to children's social care required? Yes/No

Does the school have evidence that the threshold for significant harm has been met? (child protection) Yes/No

Reason for decision

**Tick to confirm added to pupil's chronology and
copy placed on file**

Appendix 3: Safeguarding and Child Protection - Prompt sheet

This form is intended to be used, alongside the concern/incident form, to support staff with the recording of safeguarding and child protection concerns/incidents.

Have you remembered to include:

1. **what is it that you have seen/heard/noticed which concerns you?** Remember if you have noticed a mark on the pupil, it is really important to complete an attached body map, giving an indication of the shape, size and location of the mark.

Has the child communicated that something is wrong? Verbally? Change in behaviour?

2. **clear and factual information about what you have seen/heard/noticed?** If you have included your opinion in your report, have you made it clear that this is your opinion?
3. **full names of those involved and where possible, reference to staff roles?**
4. **why what you have seen/heard/noticed concerns you?** What are worried will happen if this concern/incident is not responded to?
5. **any actions you have already taken?**
6. **whether you have spoken to parents/carers about the concern/incident?** Remember, you may need to seek advice from a member of the safeguarding team if you are unsure about whether speaking to the parent may increase the risk to the pupil. If the parent is the alleged perpetrator you must always seek advice from the safeguarding team before speaking to the parent/carer.

Appendix 4: Low Level Concerns / Allegations Record - Adult working or volunteering with children/young people

CONFIDENTIAL

Name of adult at centre of concern/allegation		Role	
Name of person completing form		Role	
Date of concern/allegation		Date record made	
Name of child /children involved if applicable:			
Has concern/allegation arisen during the adult's time on school site or outside of school?			
<u>Details of the concern/ allegation</u>			
Is the adult aware of the concern/allegation?			
Action taken by person(s) completing the form:			
Who has the concern/allegation been shared with? DSL / Headteacher/Chair of Governors			
To be completed by the Headteacher/ Chair of Governors / CEO			
Does the information provided suggest that the adult has:			
<ul style="list-style-type: none"> • behaved in a way that has harmed a child, or may have harmed a child; • possibly committed a criminal offence against or relating to a child; • behaved towards a child or children in a way that indicates that he/she 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. 			
<ul style="list-style-type: none"> • has the LADO/DOFA been contacted? Yes/No If yes has a local authority referral form been completed and submitted? 			

<ul style="list-style-type: none">• has advice been taken from any other professionals? Yes / No <p><i>Include details of professionals spoken to</i></p>
<p>Details of decisions and actions taken</p> <p><i>Include here details of</i></p> <ul style="list-style-type: none">• <i>strategy discussion</i>• <i>allegations management meeting</i>• <i>no involvement by LADO/DOFA – low level concern to be dealt with internally</i>• <i>disciplinary procedures</i>• <i>no further action</i> <p><i>as applicable</i></p>
<p>Include here any safeguards which have been put in place in response to the report</p> <p><i>Include here details of</i></p> <ul style="list-style-type: none">• <i>additional adult supervision implemented</i>• <i>risk assessment required</i>• <i>additional staff training required</i>• <i>duties away from children</i>• <i>suspension during investigation</i>
<p>If a child or children has been involved, have parents/carers been informed?</p> <p>Yes / No</p> <p>If Yes, what action would they like to see?</p>
<p>Outcome</p> <p>If it is agreed that the LADO/DOFA needs to conduct an investigation, has the school been informed of the final outcome at the end of the process?</p> <p>Substantiated/ Malicious/ False/ Unsubstantiated/ Unfounded</p>

Appendix 5: Safeguarding Reading List – September 2024

‘Keeping Children Safe In Education’ requires staff to read the following documents:

Document title
1. The school’s safeguarding and child protection policy and procedures (most recent version)
2. Part 1 of Keeping Children Safe In Education (Sept 24 <u>or</u> Annex A (<i>staff are assigned which of these sections they are required to read by the Headteacher</i>))
3. Annex B Keeping Children Safe In Education (Sept 24)
4. Annex C – the role of the Designated Safeguarding Lead and deputy/deputies (KCSIE Sept 24)
5. Staff code of conduct/staff behaviour policy
6. Acceptable use policy (for use of technology and devices)
7. The safeguarding response for children missing in education (from the school’s attendance policy)
8. The school’s pupil/student behaviour policy and procedures

Additional roles and required reading

Headteachers and DSLs	<ul style="list-style-type: none">• Working Together to Safeguard Children• KCSIE – whole document• Children’s Social Care National Framework
Staff with a lead for behaviour	<ul style="list-style-type: none">• Part 1 and Part 5 of KCSIE• Annex C KCSIE (in addition to the annexes listed above)
Staff involved in recruitment	<ul style="list-style-type: none">• Part 1 KCSIE• Part 3 KCSIE• Annex E KCSIE (in addition to the annexes listed above)
HR staff	<ul style="list-style-type: none">• Part 1 KCSIE• Part 3 KCSIE• Part 4 KCSIE• Annex E KCSIE (in addition to the annexes listed above)
Staff who have responsibility for IT and online safety	<ul style="list-style-type: none">• Part 1 KCSIE• Part 2 KCSIE

Appendix 6: Arrangements to support vulnerable pupils

Vulnerable children include children who are supported by social care, those with safeguarding and welfare needs, including child in need plans, on child protection plans, 'looked after' children, young carers, disabled children and those with education, health and care (EHC) plans, although many pupils/students on EHCPs can remain safely at home.

Arrangements will be made for these pupils to continue attending school.

Support for these pupils includes:

- Regular communication with and agreed support from lead professional/social worker/Virtual Headteacher;
- Continued involvement with Children's Services and other external professionals as part of review cycle e.g. Child protection conference involvement and core group reviews. These will take place in line with local safeguarding partners' advice;
- Sign-posting respite available for families with children who have special educational needs and disabilities.

Where pupils who are deemed vulnerable are not attending school, the following safeguards have been put in place to support, in addition to the points above:

- Doorstep safe and well checks (fortnightly);
- Lead professional/social worker/Virtual Headteacher made aware of non-attendance at school and additional support from these professionals agreed;
- Telephone contact weekly;
- Links to support available made available on school website;
- Safety plan written with parents/carers to support pupils during time at home;
- Links to support available made available on school website.

Arrangements to support pupils we are concerned about but who do not meet the 'vulnerable' definition

In addition to those pupils identified as vulnerable, we are aware of the following groups who may be at increased risk during this time.

Pupils who are living in households where there is domestic abuse

Support includes:

- Telephone contact weekly
- Links to support available on school website, including contact numbers for [National Domestic Abuse Helpline](#)
- Ensuring victims are aware of the Government advice that they are able to leave their house to seek refuge if their safety is at risk
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

Pupils who have mental health issues, including anxiety and depression

Support includes:

- Teacher/tutor contact with pupils to check on well-being via school email systems or virtual learning environments. Staff aware of safeguarding procedures to follow if they have concerns about a pupil welfare
- Support from the school's pastoral team or ELSA trained staff.
- Links to support available on school website, including [Young Minds](#) and [Childline](#)
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

Pupils who are at risk of peer on peer abuse, including cyber-bullying

Support includes:

- Teacher/tutor contact with pupils to check on well-being via school email systems or virtual learning environments. Staff aware of safeguarding procedures to follow if they have concerns about a pupil welfare
- Safety plan written with parents/carers to support pupils during time at home
- Links to support available on school website, including resources for parents to access to keep their children safe online e.g. [Kidscape](#)
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

Pupils who are at risk of being left at home un-supervised

- Clear communication with parents/carers about the importance of keeping their children safe whilst they are at home, including appropriate supervision, both in the 'real world' and online
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

Support may also be offered to children in other 'vulnerable groups' on a case by case basis. This may include children from who are entitled to FSM or have limited financial resources within their family.

This document was last reviewed and updated in September 2024

The next scheduled review of this document is September 2025

Signed:.....(Head teacher/Principal)

Date:

Signed:.....(Chair of Governors)

Date

Appendix 7 - Individual Pupil/Student Risk Assessment

Pupil/Student		
Date of birth		
Class/Year group		
Date risk assessment written		
Date for review		
Who has been involved in the writing of the assessment? (including child/parents/carers)		
Professionals who need to be aware of the assessment (including school staff and multi agency professionals)		
Consent given by parents/carers	Signature	Date

Provide a brief overview below of events leading up to a risk assessment being considered	
What category/categories of harm does this involve?	Physical/Emotional/Sexual/Neglect

What behaviours are displayed? What are the outward signs?	
Does the risk of harm include:-	Risk to the child themselves Risk to peers Risk to staff
Possible triggers?	
Are there are times of the day when the risk is increased?	<i>Include detail here</i>
What additional support /supervision is in place to mitigate at these times?	<i>Include details about which staff are involved in supervision</i>
Are there are areas of the school/grounds where risk is increased?	<i>Include detail here</i>
What additional support /supervision is in place to mitigate in these areas?	

How will risk be managed off site? Eg school trips, alternative provision	
Has the child been spoken to about their behaviours?	
What sensory / physical difficulties, medical issues (including medication), communication difficulties, need to be taken into account? Are there any issues such as previous abuse, family dynamics, psychological problems that may impact upon the child's level of impulsiveness, perception of danger, emotional response, etc?	
What are the factors that contribute to the level of risk? For example, environmental cues, frustration, confusion, peer dynamics, level of demand. Please indicate factors that pose a risk in both the short and long term.	
Any additional information	
How will this assessment be monitored?	
Has the Brook tool been referred to as part of this assessment?	Yes / No
Who has responsibility for monitoring?	