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CONNECT EDUCATION TRUST

Child Protection and Safeguarding policy for Connect Education Trust

Academic Year 2026-2027

Version and Date		Action	Date to be Reviewed
12.0	09.09.2026	Trust Board Approved	1 Year - September 2027

Model Policy Update Notes
Changes made:
The model policy has been significantly updated to align with KCSIE 2026, Working together to safeguard children 2026 and DfE guidance that has been revised or introduced since September 2025, including allergy safety in schools, restrictive interventions, suspensions and exclusions, EYFS framework, mobile phones in schools and removal of the supervision exemption for volunteers. Recently passed Acts of Parliament have also been added, including the Children's Wellbeing and Schools Bill (2026).
Some sections have been split to provide improved clarity, for example there is now a separate section on a child joining or leaving a school.
Schools will need to look across their policies that relate or a linked to this safeguarding policy, such as suspensions and exclusions, child-on-child abuse, online safety, recruitment of volunteers and restrictive interventions, including the use of reasonable force.

Please note:
These two pages of notes should be deleted, along with the green highlighted text and the blue highlights of school tailoring before the policy is published.
The contents page at the front of this policy should be regenerated once the updates have been made.

KCSIE 2026 changes include *(see KCSIE Annex C for full details)*:

- The simpler version of Part One, previously set out in Annex A, has been removed. The additional information on safeguarding issues is now Annex A and the DSL job description Annex B (this too has been amended, primarily in relation to the responsibilities of information sharing).
- New responsibility on schools to that schools promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities
- The section on online safety, which includes the revised definitions of the 4 Cs of online safety and also refers to safeguarding and AI, has expectations for oversight of filtering and monitoring and cybersecurity
- Reference to early years and safeguarding and the increased safeguarding and welfare requirements (section 3) of the EYFS 2026 statutory framework
- Revised sexual abuse definition widened from "forcing or enticing" to "forcing, causing or inciting", plus greater emphasis that children are more likely to know their abuser than not, and that under-13s can never legally consent to sexual activity
- New sections on sport, toilets and changing rooms and showers (secondary only), young carers, medical needs conditions, LGBT, gender questioning, use of images and video.
- Children who are young carers now considered as vulnerable and therefore identified for support, if needed.
- Updated guidance on record keeping and sharing information with transfer schools.
- Revision relating to changes based on Working Together, including role of Family Help, which is now a new section.
- Additional requirements for ensuring safeguarding in alternative provision – this aligns to the February 2026 guidance for schools Alternative provision - GOV.UK. The DFE has also published (31 August 2026) voluntary standards for unregistered provision Non-school alternative provision: voluntary national standards - GOV.UK – schools may wish to make use of these if they place a child in such provision.
- Restrictive interventions updated guidance referred to and text amend to align with the updated DfE guidance Use of reasonable force in schools - GOV.UK which came into force on 1 April 2026.
- Data Protection (new section in policy).

- Volunteers (new section in policy) to cover revised guidance for volunteers following Crime and Policing Act coming into force in April, removal of supervised category for volunteers. Essentially all volunteers who come into contact with pupils more than three in 30 days across multiple organisations require an enhanced DBS check. A barred list check should be undertaken for existing volunteers or any who meet the regulated activity threshold for an enhanced DBS check.

  For schools with an EYFS volunteers and staff are not permitted to start without the enhanced DBS checks being completed (note: recruitment policy in appendix 2 already states this)
- Trainee teachers included in Part 4 guidance relating to allegations and concerns against staff.
- Increased focus on domestic violence and use of Operation Encompass – see Annex A
- Significantly revised part 5 for dealing with sexual harassment and sexual violence, focus now on early identification and action to prevent such behaviours from escalating into sexual abuse.
- New duty for all staff to recognise racism, faith-based prejudice, and other discrimination as harm (paragraph 17)
- Clarified child leaving and joining procedures including child protection information sharing

Important contacts

ROLE/ORGANISATION	NAME AND CONTACT DETAILS
Headteacher	Laura Pearce
Designated Safeguarding Lead (DSL)	Laura Pearce (Headteacher)
Deputy DSL	Tanya Saunders (AHT)
Safeguarding email address	safeguarding@hazelburyprimary.org
SENDCo / Inclusion Manager	Hulya Zeki
LAC / PLAC Lead	Tanya Saunders
Safeguarding Link Governor	Helen Brown
Chair of Governors	Helen Brown
Local Authority Designated Officer (LADO)	Website: Referral to LADO Email: safeguardingservice@enfield.gov.uk Tel: 0208 379 2850
MASH Duty Line	**MASH (Multi-Agency Safeguarding Hub):** Call **020 3821 1920** (Monday to Thursday, 9am to 5pm; Friday, 9am to 4:45pm) or email childrensmash@enfield.gov.uk. **Emergency Duty Team (Out of Hours):** Call **020 8379 1000** for urgent help at night, on weekends, or during bank holidays.
Channel Helpline	020 7340 7264
Enfield Prevent programme	Website: Enfield's Prevent programme | Enfield Council Email: prevent@enfield.gov.uk.

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Aims

At Hazelbury Primary School we believe that all children have a right to be safe and should be protected from all forms of abuse and neglect. The purpose of this policy is to safeguard and promote the welfare of children at Hazelbury Primary.

Safeguarding is everyone's responsibility. All members of staff are committed to recognising and reporting all concerns relating to child well-being and are vigilant in spotting signs of abuse and maltreatment. As such, we promise to have an open and positive culture around safeguarding that puts pupils' interests first. This means we:

- protect pupils from serious harm, both online and offline
- are vigilant, maintaining an attitude of 'it could happen here'
- understand and follow Hazelbury Primary School policies and procedures
- are open and transparent, sharing information with others and actively seeking expert advice when required
- work together with our safeguarding partners and other agencies when appropriate to make sure that support for children, young people and families is timely, effective and supports improved outcomes
- ensure that all those who work with pupils are trained well so that they understand their responsibilities and the systems and processes that the school operates and are empowered to 'speak out' where there may be concerns

Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3).

This policy is also based on the following legislation and statutory DfE guidance:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Children's Wellbeing and Schools Act 2026 new legislation which aims to remove barriers to opportunity in schools and improve the education system to make it safer for every child; also by strengthening regulation, improving quality of care to ensure it meets children's needs and keeping children rooted in their families and local communities where possible.
- Crime and Policing Act 2026 aims to strengthen safeguarding by giving agencies and schools greater powers and responsibilities to prevent youth crime, tackle antisocial behaviour, and protect children from exploitation and violence.
- Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 collectively known as 'data protection laws'
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Working Together to Improve School Attendance which clarifies roles and responsibilities for schools, local authorities and parents in ensuring adequate school attendance
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage (revised for September 2026)

Definitions

Safeguarding and promoting the welfare of children means (KCSIE 2026):

- 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 the 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, and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

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.

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

Nudes and semi-nudes, including where generated by AI refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18.

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.

The following three **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 London Borough of Enfield
- North Central London Integrated Care Board
- The Metropolitan Police Commander for Enfield and Haringey

Equality statement
Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face, in accordance with The Human Rights Act 1998 and The Equality Act 2010.

We give special consideration to children who:

- have special educational needs and/or disabilities (SEND) or health conditions
- are young carers
- are pregnant and/or are parents themselves
- have exhibited early signs of abusive, violent and/or harmful behaviours, including gang involvement and association with organised crime groups or county lines
- are showing signs of being drawn into anti-social or criminal behaviour
- have been repeatedly removed from the classroom, experienced multiple suspensions, are on a part-time timetable, are at risk of being permanently excluded from schools or colleges, or are in alternative provision or a pupil referral unit
- are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- are at risk of being radicalised into terrorism
- have a parent or carer in custody, or are affected by parental offending
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing alcohol and other drugs themselves
- are at risk of honour or faith-based abuse such as female genital mutilation or forced marriage, and
- are a privately fostered child.
- may experience racism, faith-targeted abuse or other discrimination because of their race, ethnicity, religion, perceived religion, lack of religion, gender identity or sexual orientation
- 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 asylum seekers
- are at risk due to their mental health needs
- are looked after or previously looked after
- are missing or absent from education for prolonged periods and/or repeat occasions
- whose parent/carer has expressed an intention to remove them from school to be home educated

Racism and abuse targeted at a child's faith, perceived faith or lack of faith can significantly affect their welfare, wellbeing and sense of safety. Such harm may constitute a safeguarding concern in its own right and will be recognised, recorded and responded to in accordance with the school's safeguarding procedures, whether it occurs in person or online.

Roles and responsibilities

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and promoting an inclusive, anti-discriminatory culture in which racism, faith-targeted abuse, other forms of discrimination, sexism, misogyny, misandry, homophobia, biphobia, transphobia, sexual violence and sexual harassment are recognised, challenged and not tolerated.

This will be underpinned by our:

- Behaviour policy
- Anti-Bullying and Anti Racism Guidance
- Online Safety Policy
- Attendance Policy
- Inclusion Policy
- Pastoral support system and Early Help systems
- Planned programme of relationships, sex and health education
- Personal Development and the wider curriculum programme
- Staff safeguarding induction and training
- Safer Recruitment

All staff

All staff will

- read and understand Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- read and understand the school's safeguarding policy for the current academic year
- sign a declaration at the beginning of each academic year to say that they have reviewed the guidance and the school's safeguarding policy
- reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- provide a safe space for vulnerable pupils to speak out and share their concerns
- know that safeguarding incidents could happen anywhere.

All staff will be aware of and understand:

- the school 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), the Behaviour Policy, the Online Safety Policy and the safeguarding response to children who go missing from education alongside the guidance and policies that underpin the school's ethos stated above.
- the Community Based Early Help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the signs of different types of abuse, neglect and exploitation (see Appendix one for details)
- recognise that racism, faith-based prejudice, and other discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety
- that racism, faith-based prejudice and other forms of discrimination can cause significant harm to a child and can adversely affect their welfare, wellbeing and sense of safety. Staff must recognise, respond to and report concerns about such harm in accordance with the school's safeguarding procedures, whether it occurs in person or online
- specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, drug taking and/or alcohol abuse, FGM, radicalisation and extremism, and the indicators that a child may be at risk of or involved in serious violence or criminal exploitation
- that these risks can occur online as well as offline, including online grooming, sexual abuse and exploitation, cyberbullying, harmful or age-inappropriate content, coercion, threats, and consensual and non-consensual making or sharing of nudes or semi-nudes
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- their responsibility to be vigilant to safeguarding concerns at all times, including concerns about the conduct or behaviour of other staff, and that all concerns must be reported promptly
- 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 or bisexual or those children who are questioning their gender can be targeted by other children
- what to look for to identify early signs of potential harm in children who need help or protection and reporting these using CPOMs so the DSL can act.
- know how to raise a concern if a child's situation does not appear to be improving following a referral.

The designated safeguarding lead (DSL) and deputy designated safeguarding lead (DDSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school, supported by one or more Deputy Designated Safeguarding Leads (DDSL). This includes the leadership of online safety, including understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

- provide advice and support to other staff on child welfare and child protection matters
- contribute to Community Based Early Help and social care assessments

- manage referrals of suspected abuse and neglect to social care, the Channel programme, and where a crime is committed to the Police
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- 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 behaviours and how to manage any incidents that may occur
- lead on online safety, including overseeing filtering and monitoring systems and processes in place at our school, also ensuring that regular reviews are formally recorded and reported to governors

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
- liaise and work with the school's relevant leads for mental health, SEND, PSHE/RSE curriculum and network/technology manager.
- promote engagement with parents/carers in safeguarding and the welfare of children
- provide strategic direction for safeguarding taking a whole school approach, including annual reviews of safeguarding and online safety to drive improvement
- raising awareness and training staff across all aspects of safeguarding
- oversee the holding and sharing of information
- 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
- understanding the views of children

The DSL will always ensure their own or a DDSL's availability to discuss and deal with any safeguarding concerns.

A DSL can be contacted via phone or face to face during school hours and term time. During out of hours and non-term time safeguarding concerns can be sent to the school via email at office@hazelburyprimary.org or safeguarding@hazelburyprimary.org. These inboxes are monitored and emails are acted upon without delay.

The governing board

The governing board will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of and underpin all relevant aspects of policy and practice, and that the school promotes an inclusive, anti-discriminatory culture in which racism, faith-targeted abuse and other forms of discriminatory harm are recognised, challenged and responded to appropriately
- promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities
- 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 governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place in our school and that their review is formally undertaken and reported.
  - 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).
  - 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.
All governors will read Keeping Children Safe in Education in its entirety, and undertake safeguarding training on appointment which is updated annually.

The headteacher

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

- Ensuring that staff (including temporary staff, contractors, trainees and volunteers):
  - are informed of our systems which support safeguarding, including this policy, as part of their induction
  - are made aware of the current Safeguarding and child protection policy, and procedures, including those for online safety, and that these are implemented and followed by all staff

- understand and follow the procedures set out in this policy, particularly those relating to the identification and referral of suspected abuse, neglect and exploitation, whether occurring online or offline

- 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 feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures
- promoting and implementing an inclusive, anti-discriminatory safeguarding culture in which racism, faith-targeted abuse and other discriminatory harm are recognised, challenged and responded to appropriately
- 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, cameras, images and video and AI in the school/setting

Contracted and supply staff

Any contracted or supply staff are made aware of the school's safeguarding systems on their first arrival at school. They are expected to follow school procedures should they have a concern about a child, another member of staff or safeguarding practices at Hazelbury Primary School. These procedures are detailed in a leaflet on a screen in reception, which all contracted and supply staff are asked to confirm that they have read.

On first arrival supply teachers will also be given a short induction into the school's safeguarding systems by the DSL or a DDSL, so they can be vigilant of pupils throughout their time in school and are conversant with how to report any concerns they may have about a child or an adult.

Staff support and supervision

The DSL will make all staff aware that support and advice is available to them.
Staff should seek support from the DSL, their line manager or a senior member of staff if they feel distressed or upset following a disclosure made by a child. The DSL or a senior member can put staff in touch with outside agencies for professional support if they wish. Staff can also approach organisations such as their Union or other similar organisations directly.

Hazelbury Primary School will ensure that members of staff who are working with foundation stage children are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) Framework (July 2026, effective from September 2026).

For DSLs, DDSLs and school leaders, supervision is primarily coordinated and delivered through the Enfield Educational Psychology Service (EPS). Staff are also given signposted to Education Support Service and MIND or any further local or national links that may be relevant to their circumstance and could aid their wellbeing.

DSL Decision-Making

Once concerns are identified and shared with DSLs, DSLs and involved staff will decide together how best to proceed to support the child and to mitigate the risk. DSLs can consult with MASH at any point. Important contact details can be found on Page 2 of this document.

Options for action are:

Pastoral Care	Keeping Children Safe in Education acknowledges the casework that schools undertake on a pastoral level. This includes managing any support for the child internally via the school's own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.

Community Based Early Help (MASH)	The school will work collaboratively with children, young people, parents and carers, and relevant partner agencies to identify and respond to emerging needs at the earliest opportunity. Where appropriate, and with the informed consent of the child and/or parents or carers, the school may refer a child or family for a **Family Help.** *For guidance refer to Working Together 2026 Chapter 3 section 2*

Referral to statutory services (MASH)	A referral should be made to MASH/children's social care (and if appropriate the police) immediately if the child is: ● A child in need; defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled ● Suffering, or likely suffering, harm. In these circumstances a Social Care Assessment will be undertaken - *For guidance refer to Working Together 2026 Chapter 3 sections 3*& 4 **Note**: Where consent is withheld, or where there are concerns that a child may be suffering, or likely to suffer, significant harm, safeguarding concerns will be referred to the appropriate children's social care service in accordance with local safeguarding procedures. **Consent will not be required where sharing information is necessary to safeguard a child**.

Allegation of harm to a child by a practitioner	If the alleged harm to a child is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.

Following several cases nationally where senior leaders in schools failed to act upon concerns raised by staff, Keeping Children Safe in Education emphasises that any member of staff must contact and/or make a referral to

Children's Social Care if they are concerned about a child. Contact details for Enfield Children's services are given at front of this policy.

Referrals to the MASH should be made immediately when there is a concern that the child is suffering significant harm or is likely to do so. It is good practice to notify MASH by phone and/or email to discuss the situation prior to sending a written referral. This will help determine the level of intervention and will also give children's social care and the police time to decide to come and see the child that same day in school, if deemed necessary.

In this school the DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the child. Still, there are circumstances where another member of staff must refer without delay:

- If for some reason (e.g., during the summer break), the DSL is not available, the referral should be made without delay by any other member of school staff
- If you disagree with your DSL's decision not to refer a case to MASH, it is your responsibility to refer the case, and to respectfully inform the DSL that you are doing so.

Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. The incident and the steps taken including speaking to the parent or carer is recorded on CPOMS.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

Details of conversations with parents or carers together with the rationale for any decision making in relation to informing parents and follow up actions will be formally recorded in the child's case file on CPOMs.

Information sharing and confidentiality
Timely information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and therefore essential to effective safeguarding. The fear of sharing information must not be allowed to prevent the promotion of the welfare of any child.

At Hazelbury Primary School, we recognise that it is our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2026. The safety of the child is always paramount.

The Data Protection Act (DPA) 2018, UK GDPR and Data (Use and Access) Act 2025 (known as 'data protection laws') do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Any concerns about sharing information must not be allowed to stand in the way of ensuring the welfare and safety of pupils. The school may legitimately share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

Staff or any adult in the school 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.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL.

Record-keeping
All child protection concerns and referrals are recorded and kept in a separate record for each child using the CPOMs online recording, managing and reporting system.
All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing, with a separate child protection record/file kept for each pupil. If you are in any doubt about whether to record something, discuss it with the DSL.
The DSL is responsible for ensuring that child protection records are kept up to date. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL (and DDSLs).
Safeguarding records are shared with staff on a 'need to know' basis only.
All information should be kept confidential and stored securely.

Recording a concern

Staff must pass all safeguarding concerns on to the DSL without delay. This should include speaking to the DSL as well as making a written record on CPOMs. Records must build into a full and detailed chronology for a child and should include:

- a clear, comprehensive written account of the concern, including, where possible, the child's words
- a record made as soon as possible after the incident or event using CPOMs. If there is an immediate concern, the member of staff should consult a DSL before completing the online record, as reporting urgent concerns takes priority
- any additional evidence, such as a child's note or drawing, added to the record
- a completed body map where injuries have been observed
- any supporting evidence of communications, including discussions, emails, letters and records of phone calls.

They should ensure the records are only accessed by those who need to see them and, where the file or content within it is shared, this happens in line with the information-sharing advice set out in section 9 of this policy.
Staff should never promise a pupil that they will not pass on child protection concerns to the relevant staff and agencies. However, the child should be reassured that:

- their disclosure will be taken seriously, and it is not creating a problem
- their disclosure will only be shared with relevant staff
- staff will be sensitive to their feelings and concerns
- their wishes will be heard
- they will be kept informed of actions and support.

Managing case records

The DSL (and DDSLs) will ensure that records are kept fully up to date, with all actions, communications and relevant supporting documentation scanned and attached to the appropriate record. To ensure a comprehensive chronology of each case the DSL and DDSLs will:

- make notes of how the concern was followed up, any actions taken, decisions reached and outcomes/resolutions.
- detail a clear rationale for each decision, including instances where referrals were and were not made to another agency such as children's social care, CAMHS or the Prevent programme
- include details of responses to actions and ongoing discussions, meeting minutes and other communication
- make reference to other school records, such as first aid, medical treatment if the child is unwell, attendance and punctuality and behaviour.

Where multiple members of staff make referrals relating to a single concern about a child, the DSL (or deputies) will link the cases within CPOMs and ensure that all relevant actions and communications are recorded as a single, coherent case thread.

Recognising abuse and taking action

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

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

In school hours you should speak immediately to the DSL.
If it is out of school hours or in exceptional circumstances the DSL is not available in school**, make a referral to children's social care and/or the police immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**
Inform the DSL as soon as possible after making the referral and ensure that a written record of the concern, referral and action taken is made on CPOMS.
Key safeguarding contact details are provided on page 2 of this policy.

If a child makes a disclosure to you

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

- listen to and believe them; allow them time to talk freely and do not ask leading questions
- stay calm and do not show that you are shocked or upset
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Report to a member of the DSL team immediately face to face or via phone and record the incident including the time and date on CPOMs. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so, as well as making the formal written record. 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.

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

Your concern must be reported in writing using CPOMs, in accordance with school procedures, as soon as possible. You may also wish to speak in person with the DSL or DDSL as well.

The DSL or DDSL will consider the concern and decide what further action is required, including whether a referral to children's social care or another agency is appropriate.

If in exceptional circumstances the DSL or DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care (see page 2 for contact details). You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible and also record these in writing on CPOMs in line with school reporting procedures.

Alternatively, you can make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible and also make a written record on CPOMs.

Community based Early Help assessment

Where **Family Help** or other early help support is appropriate, the DSL will coordinate the school's contribution and liaise with the relevant safeguarding partners and other agencies to ensure that the child and family receive appropriate, timely support. Parents/carers and the child themselves will be asked to contribute and give their views. School staff may also be asked to contribute to assessments, planning and reviews and, where appropriate, may act as the **lead practitioner** in accordance with local arrangements.

The DSL will keep the case under constant review. Where the situation does not seem to be improving, needs are not being met, circumstances escalate, or there is concern that the child may be suffering or likely to suffer significant harm, the school will make a referral to **local authority children's social care** in accordance with local safeguarding arrangements. The effectiveness and timescales of interventions will be monitored and reviewed, with action taken promptly where the support provided is not achieving the intended outcomes.

Referral for social care assessment

Where a concern meets the threshold for referral to local authority children's social care or the police, the DSL will make the referral promptly and ensure that all relevant information is shared in accordance with local safeguarding arrangements and information-sharing requirements.

The DSL will seek confirmation that the referral has been received and will ensure that the outcome and any agreed actions are recorded in the CPOMs case entry. Where the school does not receive an appropriate or timely response

the DSL will follow the local safeguarding partnership's escalation procedures and will continue to advocate for the child until their safeguarding needs have been appropriately addressed.
In accordance with Working Together to Safeguard Children 2026, the school will contribute to any subsequent assessment, planning and intervention and will share relevant information with children's social care, the police and other agencies as appropriate. Where the child's circumstances do not improve, concerns escalate, or new information emerges, the DSL will consider whether a further referral or escalation is required. The school will continue to monitor the child's welfare and will not assume that making a referral alone has resolved the safeguarding concern. Full records of review, communications and follow up actions will be kept to form a full case chronology on CPOMs

If you have concerns about extremism or radicalisation

If you have concerns that a child may be vulnerable to or at risk of radicalisation or extremism, you must report your concerns to the DSL or a Deputy DSL as soon as possible. The DSL will consider the nature and level of risk and agree the most appropriate course of action, which may include seeking advice or making a referral to the relevant agency or support service.
If there is an immediate risk of harm or danger, staff should take appropriate action to protect the child and contact the emergency services where necessary, informing the DSL as soon as possible
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 if you:

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

Staff must follow the school's safeguarding procedures for reporting and recording concerns, in addition to informing the DSL a detailed written record must be made on CPOMs by the member of staff raising the concern and by the DSL or DDSL of all communications, actions and decisions. This includes if they have made a direct referral as described above.

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
Any teacher who either:

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

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **child under 18** must speak to the DSL and follow the local safeguarding procedures. Alternatively, a report can be made directly to the Police, in addition to alerting the DSL or DDSL, and making a written report on CPOMs.
The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Any member of staff who has concerns that a pupil may be at risk of FGM must report the concern to the DSL or Deputy DSL and follow the school's safeguarding and local safeguarding procedures. Staff should not examine pupils.
Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.
Teachers and any other staff discovering and reporting a concern that FGM may have been carried out must also make written record on CPOMs.

If you have a concern about mental health

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

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

If you have a mental health concern about a child that is also a safeguarding concern, follow the relevant procedure in sections 11.1 to 11.5, depending on the nature and urgency of the concern.

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

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

Any member of staff, contractor, temporary member of staff, trainee, volunteer or visitor who has a safeguarding concern or receives an allegation that a member of staff or other adult working in or on behalf of the school may have harmed a child, may pose a risk of harm to children, or may have behaved in a way that raises a safeguarding concern, must report this to the Headteacher as soon as possible. This includes concerns or allegations relating to supply teachers, agency staff, contractors, trainees, volunteers and any other individual working in or on behalf of the school.

If the concern or allegation relates to the **Headteacher**, it must be reported directly to the CEO of Connect Education Trust. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO). Contact details can be found on page 2 of this document.
If you receive an allegation relating to an incident involving an individual or organisation using the school premises to run an activity for children, the school's safeguarding policies and procedures must be followed.
The Headteacher will take responsibility for managing concerns and allegations relating to staff and other adults and for making a referral to the LADO where required, in accordance with the school's procedures and relevant statutory guidance. This includes ensuring that appropriate action is taken in response to allegations and that any subsequent concerns are managed appropriately, including in relation to low-level concerns.

Where the concern or allegation relates to the Headteacher, the CEO will take responsibility for managing the concern and, where required, making the referral to the LADO.
All concerns and allegations must be handled promptly, confidentially and in accordance with the school's safeguarding procedures and statutory guidance. Staff must not investigate an allegation themselves or attempt to determine whether it is substantiated before reporting it.
Further information can be found in Appendix 3: Allegations against staff (including low-level concerns) policy.

Allegations of abuse made against other pupils

At Hazelbury Primary School we recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. We also understand and recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

At Hazelbury Primary School all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under Hazelbury Primary School's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. We recognise, in line with KCSIE 2026 paragraphs 37, that child-on-child abuse is likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images (see definition in section 3)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

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

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

When responding to concerns relating to child-on-child sexual violence or harassment, Hazelbury Primary School will follow the procedures set out in the Behaviour Policies and Anti-Bullying and Anti Racism Guidelines.

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

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

To achieve this, we will:

- challenge any form of derogatory, racist, faith-targeted, discriminatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- challenge and tackle any discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ensure pupils are able to report abuse using our reporting systems easily and confidently
- ensure staff reassure victims that they are being taken seriously
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- ensure staff are trained to understand how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- be alert to the likelihood of the involvement of social media

Ongoing safeguarding response

The DSL will lead the safeguarding response to concerns or allegations of child-on-child abuse and ensure appropriate support is provided to all children involved. Any disciplinary action will be carried out in accordance with the school's behaviour and disciplinary procedures, including where a police or children's social care investigation is ongoing.

Any decision to proceed with disciplinary action will be considered on a case-by-case basis, taking account of the circumstances of the incident and any advice or information provided by other agencies. The school will consider:

- whether taking disciplinary action could prejudice a police investigation or subsequent prosecution, and will liaise with the police and/or local authority children's social care where appropriate;
- whether there are circumstances that would make it inappropriate or unreasonable for the school to reach its own conclusion while an external investigation is ongoing;
- the safeguarding and welfare needs of all children involved;
- any relevant vulnerabilities, additional needs or contextual factors; and
- whether any action taken could place a child at further risk of harm.

The school will ensure that safeguarding considerations remain central to any disciplinary decision and that disciplinary measures do not prevent the school from continuing to provide appropriate support and protection to children involved. This includes any decision for separation of pupils for safeguarding reasons; in such cases leaders will adhere to the school's Suspensions and exclusions policy and procedures which is in line with DfE statutory guidance paragraphs 26-34.

Raising concerns about safeguarding practices & whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and know that such concerns will be taken seriously by the senior leaders, governors and/or the LADO (see page 2 for contact details). Information on raising concerns can be found in the school's whistle blowing policy.

Where a staff member feels unable to raise an issue with the headteacher or other senior leader or governor, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 or email: help@nspcc.org.uk.

Making and sharing of nudes and semi-nudes, including where generated by AI

Any staff member, adult in the school or parent/carer made aware of an incident involving the making or sharing of nudes and semi-nudes, must report this to the DSL immediately. The member of staff**, adult in the school or parent/carer** must **not**:

- view, copy, print, share, store or save the imagery, or ask a pupil to share or download it. If the imagery has already been viewed by accident, this must be reported to the DSL.
- delete the imagery or ask the pupil to delete it
- ask the pupil(s) who are involved in the incident to disclose information regarding the imagery. This is the DSL's responsibility.
- share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- say or do anything to blame or shame any young people involved

It must be explained to the pupil(s) the incident must be reported and provide reassurance that they will receive support and help from the DSL.

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMs to form a full case chronology.

Initial review meeting

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

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

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

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

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

Informing parents/carers

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Safer Schools officer or the local neighbourhood police (101).

Curriculum coverage

*Curriculum teaching in online safety is set out in sections 17.3 (online safety curriculum) and section 27 (*opportunities to teach *safeguarding).*

Reporting systems for our pupils

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

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

To achieve this, we:

- put systems in place for pupils to confidently report abuse
- Ensure we promote reporting systems with pupils via PSHE lessons, assemblies and workshops (for example anti-bullying)
- All staff must ensure pupils have an opportunity to complete a daily wellbeing check and have access to worry boxes within the classroom
- ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- seek and consider pupils' views on the effectiveness and accessibility of the reporting systems and responses as part of the annual safeguarding review and ongoing pupil voice activities.

Online safety and the use of mobile technology

Whole school approach to online safety

At Hazelbury Primary School we recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
At Hazelbury Primary School we use a wide range of technology. This includes computers, laptops, tablets, Chromebooks, the internet, our learning platform, email systems, messaging systems and other digital devices.

All school owned devices and systems must be used in accordance with our acceptable use policies and with the school's appropriate safety and security measures. All devices owned by staff, pupils and visitors must also be used in accordance with our acceptable use policies and the appropriate safety and security measures.
Our whole school approach to online safety is reflected in our online safety policy and other relevant school policies, and based on addressing the four categories of risk set out in KCSIE:

- **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- **conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, pupils or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/) and to the DSL.

To address this, Hazelbury Primary School:

- has robust processes in place, including filtering and monitoring systems, to ensure the online safety of pupils, staff, volunteers and governors
- protects and educates the whole school community in its safe and responsible use of technology, including mobile and smart technology, safe use of AI, online safety, cyber security and filtering and monitoring systems
- sets clear guidelines for the use of mobile phones for the whole school community
- establishes clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- annually review our online safety strategies and systems using the SWGfL 360ºaudit tool,

Filtering and monitoring

At Hazelbury Primary School we will aim to meet the DfE standards for filtering and monitoring in order to provide a safe learning environment for all. As part of our work to meet these standards we will:

- consider the number of and age range of our children,
- identify and assign roles and responsibilities to manage filtering and monitoring systems
- ensure the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- direct and supervise pupils to age-appropriate online resources and tools, according to their age, ability and those who are potentially at greater risk of harm
- be informed in part, by the risk assessment required by the Prevent Duty

- have effective monitoring strategies in place that meet their safeguarding needs and reviewed at least annually, keep a formal record of these checks and also report the findings to governors.

Online safety curriculum

At Hazelbury Primary School, we have developed a whole school approach to online safety learning and have embedded this in our PSHE and RSHE curriculum to enable pupils of all ages to learn about and manage online risks effectively. This is supplemented through our assemblies and special events, such as Safer Internet Day. See section 27 (opportunities to teach safeguarding) for further details.

We will regularly provide parents and carers with information about online risks and practical guidance to help keep their children safe when using the internet and digital technologies outside school. This is provided to parents via our website, newsletters, emails, social media and during a variety of meetings with parents which includes Meet the Teacher, Bring your Grown to School and Online Safety Meetings.

Online safety training for staff

Hazelbury Primary School will ensure that all staff receive appropriate and regular (at least annual) online safety training as part of the school's wider safeguarding training. Training will equip staff to recognise and respond to online safeguarding concerns and ensure they understand their roles and responsibilities in relation to online safety. This will include:

- the effective use of filtering and monitoring systems and the reporting of concerns.
- the safe, responsible and effective use of generative artificial intelligence (AI), including understanding potential safeguarding risks;
- awareness of the range of online risks children may experience, including those associated with gaming, social media, generative AI and excessive or inappropriate use of devices; and
- understanding how online risks can impact children's wellbeing, behaviour, relationships and safety, and how these concerns should be identified and addressed through the school's safeguarding procedures.

Artificial intelligence (AI)

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

Hazelbury Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse, enable misinformation, and/or expose pupils to harmful content.

To support the responsible and safe use of AI to enhance teaching, learning and operational efficiency all staff and pupils are expected to adhere to the school’s policy/guidance on the use of AI, this includes details of the preferred AI tool. This is referenced in the Trust Online Safety Policy.

Hazelbury Primary School recognises that filtering and monitoring requirements apply to the use of generative AI within education. The school’s arrangements for overseeing, checking and reporting on the effectiveness of filtering and monitoring systems, including their application to generative AI tools, are referred to in section 17.2 and in our online safety policy**.**

Staff will be trained in the school approach to generative artificial intelligence and how to use it effectively and safely when carrying out their duties and responsibilities.

The school will treat any use of AI to access harmful content or bully pupils in line with this policy and our online safety and behaviour policies.

Use of images, videos and CCTV

Hazelbury Primary School recognises the importance of safeguarding and protecting our pupils when using photographs, videos and CCTV. In accordance with data protection laws, KCSIE 2026 and EYF 2026. To safeguard our pupils, we will:

- ensure all images and recordings are stored securely and accessed only by authorised staff and retained for no longer than necessary.

- obtain parental consent for the use of photographs and videos of pupils and ensure they are used only for legitimate school purposes and in accordance with the permissions given.
- ensure that staff do not take, store or share photographs or videos of pupils using personal devices or unless authorised to do so.
- ensure that all photographs or videos of pupils are managed in accordance with our safeguarding and data protection procedures, that any concerns of inappropriate use, sharing or storage of images or videos is reported to the DSL and/or data protection officer
- use CCTV appropriately to support the safety and security of pupils, staff and visitors and to help prevent and investigate incidents. CCTV will be operated in accordance with the school's CCTV and data protection procedures, with appropriate signage and controls in place.

Mobile phones

At Hazelbury Primary School mobile phones are not permitted to be used by pupils during the school day, in accordance with the Department for Education's guidance on mobile phones in schools.

Any mobile phone brought onto the school site must be switched off and stored in accordance with the school's arrangements. The school will apply appropriate consequences where this expectation is not followed, in line with the Mobile Phone policy which can be found on the school website.

Information security and cyber security

Hazelbury Primary School takes full responsibility to safeguard the school's systems, and the information held on staff and pupils. Cyber security arrangements are in place to ensure all information is held securely and in line with data protection laws. Our procedures are periodically reviewed for their effectiveness to keep up with evolving cyber-crime technologies and ensure the security and integrity of school systems. We are working to meet the DfE cyber security standards for schools to help improve our resilience against cyber-attacks.

Should a data breach or cyber incident occur, we will follow the trust Cyber incident response plan.

Our governing body will make use of guidance and resources from the National Cyber Security Centre – NCSC, to support the school in maintaining and strengthening its cyber security arrangements.

Vulnerable Pupil Groups (children potentially at greater risk of harm)

Whilst all children should be protected, we, at Hazelbury Primary School, recognise that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups.

We offer additional pastoral support for all our more vulnerable pupils.

Children with SEND

We recognise that pupils with SEND can face additional safeguarding challenges and are more vulnerable to abuse than their peers. Additional barriers can exist when recognising abuse and neglect in this group, include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's needs and/or disability without further exploration
- pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- the potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and

- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison between the DSL (or DDSL) and our SENCo, along with any additional pastoral support and care they may need.

Children with medical conditions

An incident relating to the management of a pupil's medical condition, including allergies, will not in itself constitute a safeguarding concern or require a referral to local safeguarding partners. However, a safeguarding referral will be considered where there are concerns that a child or young person's medical condition may increase their vulnerability to neglect, abuse or exploitation, or where their medical needs are not being appropriately met. This may include situations where essential information about a child's medical condition has not been shared with the school, or where a child is repeatedly sent to school without essential medication or support, placing them at risk of harm.

We will take further advice from the DfE statutory guidance on Supporting pupils at school with medical conditions and Allergy safety in schools. Please also refer to the trust policy, First aid and managing medicines and supporting pupils with medical needs.

Pupils requiring mental health support

The school recognises the importance of supporting children and young people's mental health and emotional wellbeing. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. Staff should also be alert to changes in behaviour, presentation, attendance or emotional wellbeing. Any of these could be an indication that a child has suffered or is at risk of suffering abuse, neglect or exploitation and therefore may require. appropriate early help, pastoral and specialist mental health support

If a member of staff has any concerns about a child's mental health or safety, they should follow the school's safeguarding procedures, reporting this on CPOMs and speaking to the DSL or DDSL In line with KCSIE 2026, we will work with pupils, parents/carers and relevant professionals to ensure that timely and appropriate support is provided.

Staff should be mindful that only an appropriately trained professional should attempt to make a diagnosis of a mental health problem. However, staff still have an important role to play in promoting good mental wellbeing and preventing the onset of mental illness.

Pupils with a social worker

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

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

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

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

Looked-after and previously looked-after children

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

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

We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

Care leavers

Hazelbury Primary School recognises that care leavers may require ongoing support. The DSL and/or Designated Lead for looked after children will maintain relevant contact details and work with the young person's Personal Advisor as necessary to address any safeguarding or welfare concerns affecting the care leaver.

Young carers

A young carer is a person under 18 who provides, or intends to provide, care for another person, other than where the care is provided under a contract, as voluntary work or otherwise for payment. Being a young carer does not constitute a safeguarding concern. However, caring responsibilities may contribute to or indicate additional vulnerability.

Hazelbury Primary School recognises that children and young people who provide, or intend to provide, care for a family member may be particularly vulnerable to a range of safeguarding and wellbeing concerns.

We will seek to identify young carers at the earliest opportunity and ensure that their caring responsibilities are considered as part of its safeguarding, pastoral, attendance, inclusion and early-help arrangements. Staff should be alert to the possibility that a child may be a young carer even where this has not been formally identified, and information passed to the DSL.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The DSL or DDSL will be aware of contact details and referral routes in the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Gay, Lesbian and bisexual children

Hazelbury Primary School recognises that being lesbian, gay or bisexual is not in itself an inherent risk factor for harm; however, children who are, or are perceived to be, lesbian, gay or bisexual may be targeted by other children and may therefore be vulnerable to safeguarding concerns. We will:

- ensure all pupils are treated with dignity and respect;
- take action to prevent and respond to discriminatory bullying, harassment and abuse, including that related to sexual orientation; and
- provide a safe and supportive environment where children can speak to trusted adults and raise any concerns.

If a member of staff has any concerns that a pupil, who is, or is perceived to be, lesbian, gay or bisexual is at risk of or subject to discriminatory bullying, harassment and abuse, they should follow the school's safeguarding procedures, reporting this on CPOMs and speaking to the DSL or DDSL

Children who are gender questioning

At Hazelbury Primary School, we will ensure that the safeguarding and wellbeing of children who are questioning their gender are considered sensitively, respectfully and on a case-by-case basis, in accordance with the school's policies for dealing with such cases and current statutory guidance.
If a child or parent raises this issue, we will:

- listen to the child's views and take account of their wishes and feelings, while ensuring that safeguarding remains our primary consideration;
- consider any specific vulnerabilities or risks, including bullying, harassment, discrimination, isolation or mental health concerns, and take appropriate action where required;
- work with parents/carers and relevant professionals where appropriate and in accordance with the child's individual circumstances, safeguarding duties and relevant statutory guidance; and
- record relevant concerns, discussions, decisions and actions appropriately on CPOMs.

Child leaving or joining the school

Child leaving the school

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
To allow the new school/college to have support in place when the child arrives, this should be within **5 days** for an in-year transfer, or within **the first 5 days** of the start of a new term
In addition, if the concerns are significant or complex, and/or social services are involved, the DSL should consider sharing information in advance of the child leaving, where this would enable the receiving school to make any necessary preparations to ensure the safety of the child on arrival at the new school.
If the next school is not known, the school procedures for children missing from education (CME) must be followed and in the case of a child of any concern, children's services alerted. Once the child is removed from roll and their file transferred, their safeguarding file is archived.
Where a pupil is home-educated or leaves the country, their safeguarding file will be securely retained and archived in accordance with the school's records retention policy.

Child joining the school

When a child joins Hazelbury Primary School we will ensure that all relevant safeguarding and child protection information is obtained promptly from the child's previous school or setting. This information will be transferred securely, stored in accordance with our record-keeping procedures, and shared with appropriate staff on a need-to-know basis to ensure that the child's safety and welfare are effectively supported from the point of admission.

Remote education

The school's policy on remote education includes the arrangements for the safeguarding of pupils while they are learning from home. The school will maintain regular contact with their parents/carers. As part of our regular communications with parents/carers we will reinforce the importance of pupils being safe online. This includes:

- providing information to parents and carers to help them understand what systems the school has in place to filter and monitor online use
- informing parents and carers of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

If a pupil fails to log on when expected to, the DSL or other member of staff will make contact with parents/carers to check on the safety and wellbeing of the pupil and may make a home visit.

Use of alternative provision

From time-to-time we place a pupil with an alternative provision provider. We have a policy and clear protocols for the use of alternative provision. The school retains responsibility for the safeguarding of pupils placed in alternative provision and will undertake appropriate due diligence before any placement is made. This will include a visit to the provision by a member of school staff to ensure that it is suitable for the pupil's individual needs and has robust safeguarding arrangements in place that meet the requirements of KCSIE.
We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, in line with the checks the school would undertake for its

own staff. The provider must also inform the school of any staffing changes or other arrangements that may put the child at risk, so that appropriate safeguarding checks can be assured. In addition, we will obtain written assurance that the provider knows where the pupil is based during school hours and will notify us immediately if a child is not attending, goes missing or a safeguarding concern is identified. We will review placements at least half-termly.
Hazelbury Primary School will ensure that any pupils placed in alternative provision follow an appropriate RE/RSE/RSHE and online safety curriculum.

Elective Home Education

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer expresses an intention to remove a child from school to educate them at home, Hazelbury Primary School will work with Enfield local authority and other relevant professionals to coordinate a meeting with the parent/carer, where possible, before a final decision is made. This is particularly important where a child has special educational needs or a disability, has a social worker, or is otherwise vulnerable.

Hazelbury Primary School recognises that some children educated at home may not receive a suitable education and may be less visible to services responsible for their safety and wellbeing. We will discuss these considerations with parents expressing an intention to remove their child from the school to support an informed decision that is in the child's best interests.

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. If such arrangements come to the attention of school staff through the normal course of their interaction with children, we will notify the appropriate Enfield Local Authority to allow officers to check if the arrangement is suitable and safe for the child.
We will follow the guidance set out in Championing kinship care: national kinship care strategy working with the Enfield Virtual School head to support any children in kinship care arrangements and to promote their achievement.

Children staying with host families

Hazelbury Primary School may make arrangements for pupils to be provided with care and accommodation by a host family to whom they are not related, for example as part of a foreign exchange visit or sports tour. In such circumstances, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay in line with guidance on host families in KCSIE 2026.

Preventing radicalisation

Children can be vulnerable to extremist ideology and radicalisation. Hazelbury Primary School recognises its responsibility to protect pupils from the risk of being drawn into terrorism or extremist activity and to fulfil its duties under the Prevent duty.
The DSL will ensure that a Prevent risk assessment is completed and reviewed at least annually, and when circumstances change. The assessment will consider risks within the school and the wider context, including online risks, and identify appropriate measures to reduce those risks.
All staff will receive appropriate training to recognise indicators that a pupil may be at risk of radicalisation or being drawn into extremist activity and know how to report concerns. Prevent awareness will be reinforced through safeguarding updates and briefings.

Through the curriculum, PSHE, online safety education and the school's ethos and values, pupils will be supported to develop critical thinking, understand risks associated with extremism and radicalisation, and know how to seek help and support. The school promotes an inclusive environment and fundamental British values.
As set out in section 11.6, staff must report concerns about radicalisation or extremism in accordance with the school's safeguarding procedures, alerting the DSL or DDSL and also making a written report of the concern on CPOMs.

Restrictive interventions, including the use of reasonable force

There may be circumstances where staff at Hazelbury Primary School need to use reasonable force or another restrictive intervention to safeguard pupils, prevent harm or maintain safety.
The term 'restrictive intervention' is defined by the DfE as a means to prevent, restrict or subdue movement of the body or part of the body, of a pupil. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. In such circumstances, reasonable means using no more force than is necessary and for the shortest time necessary. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.
We always seek to minimise the use of restrictive interventions through positive relationships, effective behaviour support, appropriate adjustments and de-escalation strategies. Restrictive interventions must never be used as a form of punishment and staff should use the least restrictive option appropriate to the circumstances.
The school's policy follows the Department for Education's Restrictive interventions, including the use of reasonable force guidance. This includes pupil welfare checks, incident reporting, parental notification, recording on CPOMs and follow up actions, including behaviour support plans for a pupil(s), review of staff training and relevant safeguarding requirements. When managing incidents of restrictive interventions, including use of reasonable force, leaders will consider whether to liaise with the LADO, for example, where it is thought that the physical intervention may lead to an allegation.
Hazelbury Primary School will ensure staff are familiar with its policy and receive appropriate training in prevention, de-escalation and safe, proportionate intervention. Staff whose roles require it will receive additional training in the safe use of restrictive interventions. Should a member of staff be in a position where they use 'reasonable force' they must inform the DSL and Headteacher and provide a written report.

Opportunities to teach safeguarding

At Hazelbury Primary School, we recognise our essential role in helping pupils understand healthy and appropriate behaviour, recognise when they or others may be unsafe, and know how to seek help and support. We regard preventative education as a fundamental part of our approach to the safeguarding of our pupils.

Safeguarding is embedded throughout the curriculum and includes relationships and sex education (RSE/RSHE), online safety, PSHE, assemblies, tutor programmes and other age-appropriate activities and events. Our curriculum supports pupils to develop self-awareness, confidence, social and emotional understanding, resilience and decision-making skills, enabling them to recognise and manage risks both in person and online.
We promote an inclusive, anti-discriminatory culture of respect in which racism, faith-targeted abuse, other forms of discrimination, sexism, misogyny, misandry, homophobia, biphobia, sexual violence, sexual harassment, derogatory behaviour and other forms of violence or abuse are recognised, challenged and not tolerated.
Our approach is tailored to the age, needs and circumstances of our pupils, with additional support and appropriate teaching provided for vulnerable pupils, victims of abuse and pupils with SEND. We ensure that pupils are prepared for transitions to the next stage of their education and understand how to seek help when they have concerns.
We encourage pupils to speak openly about worries or concerns, confident that they will be listened to, taken seriously and supported appropriately.
The school will assess the suitability of external organisations, resources and speakers before they are used with pupils. This will include consideration of their educational value, age appropriateness, safeguarding arrangements and whether appropriate checks are required.

This is a link to the Connect Education RSE policy.

Staff Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand Hazelbury Primary School safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This includes contractors, trainees and volunteers.

This training will be regularly updated and will:

- be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- be in line with advice from the 3 safeguarding partners
- include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- include how to recognise and respond to child-on-child abuse that is prejudice-based or discriminatory, including racism and faith-targeted abuse
- have regard to the Teachers' Standards to support the expectation that all teachers will have a clear understanding of the needs of all pupils and will manage behaviour effectively to ensure a good and safe environment

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

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

The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years. They will also undertake any additional training in specific safeguarding aspects to better support their roles, for example in domestic abuse, knife crime or child-on-child abuse.

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

They will also undertake Prevent awareness training.

Governors

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

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

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

Recruitment

At Hazelbury Primary School, we follow Safer Recruitment requirements in line with the guidelines set out in KCSIE Part 3 as documented in our Safer Recruitment Policy.

At least one person conducting any interview for any post at the school will have undertaken Safer Recruitment training. This will cover, as a minimum, in line with the expectations given in KCSIE and in line with local safeguarding procedures. This training will be renewed at least every two years.

Volunteers

Hazelbury Primary School will carry out appropriate safeguarding and safer-recruitment checks on all volunteers and will complete a written risk assessment when deciding whether a Disclosure and Barring Service (DBS) check is required and, where eligible, the level of check to obtain. The assessment will take account of the nature and frequency of the role, the ages of the children, the degree of contact with children, whether the volunteer will work alone or be supervised, and any other relevant safeguarding risks.
From 1 September 2026, supervision does not prevent a volunteer's work from being regulated activity. A volunteer who teaches, trains, instructs, cares for or supervises children on more than three days in any 30-day period, or overnight, will be engaging in regulated activity even if supervised. The school will obtain an enhanced DBS check with children's barred-list information for any volunteer engaging in regulated activity and will ensure that a barred person is not permitted to undertake that activity.

Where a volunteer is not engaging in regulated activity, the school will determine whether an enhanced DBS check without barred-list information is appropriate and legally available, based on the role and its associated risks. The school will not request barred-list information unless the role is eligible for it.
All volunteers will receive appropriate safeguarding induction, understand the school's safeguarding procedures and staff code of conduct, know how to report concerns, and be appropriately supervised. Volunteer checks, risk assessments, decisions and supervision arrangements will be recorded and reviewed if the role or circumstances change.
Where the school is subject to the Early Years Foundation Stage (EYFS) framework, volunteers must not begin working in any provision covered by the EYFS framework until the school or maintained nursery school has received the volunteer's enhanced DBS certificate, including children's barred-list information.

Attendance and Punctuality

School attendance and punctuality policy

Hazelbury Primary School has in place an attendance policy based on the DfE guidance Working together to improve school attendance.

We aim to ensure that all children attend school regularly and punctually, so that they can access their education, achieve their potential and remain safe. We monitor attendance closely and take appropriate action where attendance causes concern, working with children, parents/carers and relevant agencies to identify and address barriers to regular attendance.

In line with the recommendation in KCSIE 2026, where reasonably possible, we will hold more than one emergency contact number for each pupil.

Children Missing in Education

If a child on roll at Hazelbury Primary School does not attend because of a move of home or school, because the parent has decided to home educate, or for a reason unknown to the school, the following steps will be taken:

- the child will remain on roll at Hazelbury Primary School until removal from the roll is authorised by the Enfield attendance team and the Headteacher
- the new school will be contacted and confirmation of the child's registration received in writing
- the school will inform Enfield local authority if enrolment at another school cannot be confirmed.

Children Absent in Education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect
- are at risk of forced marriage or FGM

- come from gypsy, Roma, or traveller families
- come from the families of service personnel
- go missing or run away from home or care
- are supervised by the youth justice system
- cease to attend a school
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.
If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will: If a child goes missing, we will contact the pupil's parents/ carers and inform the police. The child will be looked after by a member of the DSL Team and the incident would be recorded on CPOMS, following the guidance set out in Children Missing Education Statutory Guidance for Local Authorities 2016.

Non-collection of children

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

- The child will stay with the Office team/SLT.
- During that time, every effort will be made to contact the parent/carer, or failing that, the emergency contact.
- In the case of a pupil not being collected and no contact being made by 4.45pm, the school will ring the Duty Social Worker to discuss the concerns and ask for advice.
- School will continue to try and contact the parent/carer/emergency contact.
- The member of SLT on duty will record the communication with Social Care and record the incident on CPOMS
- Consequent action will depend on advice from Social Care.

Regulations and safeguarding requirements relating to school premises

Toilets

At Hazelbury Primary School we provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and Education (Independent School Standards) Regulations 2014.
At Hazelbury Primary School we do not allow children into toilets designated of the opposite biological sex. This includes when we are responding to a request to support any degree of social transition for children questioning

their gender. If a child questioning their gender does not want to use the toilet designated for their biological sex, we will consider if we can provide an alternate toilet facility which will not compromise the safety, comfort, privacy or dignity of the child or any other children.

Checking the identity and suitability of visitors

All visitors must report to the main reception on arrival.
All visitors, including volunteers, supply staff and contractors, will be required to verify their identity to the satisfaction of staff and state the purpose of their visit to the school.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors, including volunteers, supply staff and contractors, should be ready to produce photographic identification (such as a driver's licence) on first arrival.
Visitors, including volunteers, supply staff and contractors, are expected to sign the visitors' book and wear a visitor's badge at all times.
On arrival all visitors, including volunteers, supply staff and contractors, are provided with information via our electronic signing system detailing the school's safeguarding procedures. All visitors and volunteers, supply staff and contractors, are expected to follow our school safeguarding practices and procedures should they have a concern about a child, a member of staff or any another adult.
Visitors, including contractors, to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

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

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

Site security

At Hazelbury Primary School, we maintain appropriate controls over access and visitors, secure entrances and exits, effective supervision of pupils, and procedures for responding to unidentified or unauthorised individuals on the premises.
All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. This includes following school procedures for challenging any individual who is not known or identifiable.
In the event of a serious incident, Hazelbury Primary School has emergency procedures in place to support the safety and welfare of pupils, staff and visitors. Staff and pupils will be made aware of the relevant procedures and the actions they should take in the event of an emergency.
Leaders will regularly review site security arrangements and address identified risks through appropriate risk assessments and control measures. This includes consideration of safeguarding during pupil arrival and collection times, school events, contractors working on site and any special circumstances where normal site security arrangements are altered.

Use of school premises by outside organisations

Our facilities/premises are hired or rented out to organisations or individuals on both a regular and occasional basis. At Hazelbury Primary School we will seek assurance and verification that the organisations or individuals concerned have appropriate safeguarding and child protection policies and procedures in place in line with DfE guidance Keeping children safe during community activities, after school clubs and tuition.
We will also put in place arrangements for a representative of the organisation or individual hiring our facilities to liaise with the school on any safeguarding concerns. This applies regardless of whether or not the children who

attend any of these services or activities are children on the school roll. As part of the terms of hire agreement between the school and organisation, we will seek written assurance that each hirer has appropriate arrangements in place to keep children safe in line with KCSIE 2026.
If a concern is raised about an adult working for any of the organisations or an individual using the school's premises, the school will follow its procedures for dealing with allegations against staff, this includes informing the LADO.
Any services or activities provided by the Trust and under the direct supervision or management of their school, the school arrangements for child protection will apply.

Transport and off-site activities
Children must be kept safe while on outings. Hazelbury Primary School will assess the risks or hazards which may arise for children and identify the steps to be taken to remove, minimise and manage those risks and hazards. Risk assessments will take account of the age, needs and individual circumstances of the children attending and must include consideration of appropriate adult-to-child ratios.

Where pupils are transported in vehicles, the vehicles and drivers will be appropriately insured and suitable for transporting children. Pupils will use appropriate restraints, including seat belts and child seats where required. Pupils will be appropriately supervised at all times.

Staff will be aware of the school's safeguarding procedures and know what to do if a child becomes separated from the group, goes missing, is injured, or a safeguarding concern arises while on an outing. Appropriate procedures will be in place for responding to emergencies. *The member of staff responsible for leading the trip would contact the School Office to speak to a member of the DSL team. When the member of staff returns to school they will record the incident on CPOMs.*

Where staff use their own vehicles to transport pupils, this must be authorised by Hazelbury Primary School. Staff must hold a valid driving license and ensure that their vehicle is roadworthy, appropriately insured for transporting pupils and fitted with suitable seat belts/restraints. Appropriate safeguarding and supervision arrangements must be in place, and any incidents or concerns must be reported to the DSL.

For further details staff should refer to our Connect Education Visits Guidance.

Links with other policies

This policy links to the following school policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle-blowing
- Ant-bullying
- Online safety
- IT acceptable use

Monitoring and review arrangements

At Hazelbury Primary School, we take a proactive approach to monitoring safeguarding arrangements in place to ensure they are effective. The DSL and Headteacher will provide regular reporting on child protection and safeguarding to the Governing Body. These reports will not include details of individual children's situations or identifying features of families as part of their oversight responsibility.
The Trust has adopted varied approaches to the monitoring of the school's safeguarding arrangements, these include:

- regular meetings with the DSL and other key staff
- visits to school
- ascertaining the views of staff, pupils and parents through formal and informal discussions and/or surveys
- use of an audit tool
- asking all governors to ask a safeguarding question during meetings with leaders/staff on other aspects of school life,
- checking the Single Central Register 3 times per year
- reviewing school data
- use of external consultants.

The DSL will undertake an annual audit of safeguarding using the Enfield safeguarding audit tool. This will be submitted to the Enfield safeguarding team and reviewed. Information from the audit will be used to improve our child protection and safeguarding arrangements**.**

This policy will be reviewed annually and then ratified by board of Trustees

Appendices

Appendix 1: Types of abuse, neglect and exploitation

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse*. (KCSIE 2026)*
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 as well as other verbal abuse, such as persistent criticism or name-calling
- not giving the child opportunities to express their views, deliberately silencing them or belittling by '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

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. Rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing.
- Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse
- Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children are more likely to know the person who abuses them than not. A child under the age of 13 can never legally consent to sexual activity.

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer recruitment policy

Recruitment and selection process

[The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2026.

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

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

Advertising

When advertising roles, we will make clear:

- our school's commitment to safeguarding and promoting the welfare of children
- that safeguarding checks will be undertaken
- the safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account
- include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Application forms

Our application forms will:

- include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- consider any inconsistencies and look for gaps in employment and reasons given for them
- explore all potential concerns

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

- complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - if they have a criminal history
  - whether they are included on the barred list
  - whether they are prohibited from teaching
  - information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - any relevant overseas information
- sign a declaration confirming the information they have provided is true.

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

Seeking references and checking employment history

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

When seeking references we will:

- not accept open references

- liaise directly with referees and verify any information contained within references with the referees
- ensure any references are from the candidate's current employer and completed by a senior person. where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- verify their identity
- obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- verify their mental and physical fitness to carry out their work responsibilities
- verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- verify their professional qualifications, as appropriate
- ensure they are not subject to a prohibition order if they are employed to be a teacher
- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - for all staff, including teaching positions: criminal records checks for overseas applicants
  - for teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- in academies, free schools and independent schools, carry out a check if the candidate is the subject of a section 126 direction that prohibits them from taking up a management position as an employee.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

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

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

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

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

Agency and third-party staff
We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.
Contractors
We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

We will obtain the DBS check for self-employed contractors.
We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
We will check the identity of all contractors and their staff on arrival at the school.
For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do

not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

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

Volunteers

All volunteers will be subject to appropriate safeguarding and safer recruitment checks before starting their role**.**

Volunteers who teach, train, instruct, care for or supervise children on more than 3 days in any 30-day period, or overnight between 2am and 6am, will be considered to be engaging in regulated activity and will require an Enhanced DBS check with Children's Barred List information, regardless of supervision.

Volunteers who do not meet these regulated activity criteria will be subject to appropriate checks and risk assessment based on their role and level of contact with pupils.

Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Where the school is subject to the Early Years Foundation Stage (EYFS) framework, volunteers must not begin working in any provision covered by the EYFS framework until the school or maintained nursery school has received the volunteer's enhanced DBS certificate, including children's barred-list information.

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

All proprietors, trustees, local governors and members will also have the following checks:

- a section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- identity
- right to work in the UK
- other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

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

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

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

Section 1: Allegations that may meet the harm threshold

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

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

If we are in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).
We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
Our procedures for dealing with allegations will be applied with common sense and judgement.
If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations
In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

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

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. *Support is available to individuals from their trade union representatives, if applicable and from the Education Support website (Helpline 080000 562 561)*
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

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

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

Non-recent allegations

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

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

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

Section 2:Concerns that do not meet the harm threshold

[The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.]
This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:

- suspicion
- complaint
- safeguarding concern or allegation from another member of staff
- disclosure made by a child, parent or other adult within or outside the school
- pre-employment vetting checks

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

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

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

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

- being overly friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils.

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

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns as per section 12 of this policy
- empowering staff to self-refer
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping to identify any weakness in the school's safeguarding system

[Add more detail about how you create an open culture, and the role of your headteacher and DSL in your school's process/procedure for confidentially sharing low-level concerns.]

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.
[Add more detail about your procedures for responding to low-level concerns. Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

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

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

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

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

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

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

Appendix 1: types of abuse and neglect

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. A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

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

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

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

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

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

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

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

Recruitment and selection process

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

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
-

Shortlisting

Our shortlisting process will involve at least 2 people and will:

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

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

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

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

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

Schools have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour from existing staff. This includes creating the right environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

It is important that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member. This can assist employers to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

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

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

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

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

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

We will obtain the DBS check for self-employed contractors.
We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
We will check the identity of all contractors and their staff on arrival at the school.
For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.
In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Trustees and LGB Governor

All Trustees and LGB Governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.
The chair of the Trust Board will have their DBS check countersigned by the secretary of state.

All proprietors, Trustees, LGB Governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where the school places a pupil with an alternative provision provider, they must obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. The school will continue to be responsible for the safeguarding of that pupil. The school should be satisfied that the placement meets the pupil's needs.

Adults who supervise pupils on work experience

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

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

Elective Home Education

Elective home education can mean that some children are not in receipt of suitable education. However, many home educated children have a 'positive learning experience'.

Pupils staying with host families

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

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

Appendix 3: Allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Support available to individuals in Connect Education Trust includes, a line manager, trade union representatives, a colleague, the Employee Assistance Program and Occupational Health.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution
The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.
Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

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

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

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.
We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.
This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 8 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

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

Keeping Children Safe in Education also links to this report for more information - Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our

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

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

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

References

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

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

Appendix 4: Specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B and reflects our context and locally agreed procedures by the 3 safeguarding partners.

Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

Children with unexplainable and/or persistence absences from education

A child with unexplainable and/or persistence absence from education, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who have unexplainable and/or persistence absences from education, particularly on repeat occasions, for prolonged periods or persistently absence, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of being absent in future. This is particularly important for children known to social care. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. The school follows the Working together to improve school attendance guidance to maintain high levels of school attendance and good practice.

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

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

Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced

into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Unexplained and/or persistence absences from education
- Not taking part in education

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

Child sexual exploitation

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

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

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

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

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

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

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

Child-on-child abuse, sexual violence and sexual harassment

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

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.
Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity • owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing

Domestic abuse

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

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

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

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

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

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

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable

- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

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

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

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

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

We will ensure that suitable and robust systems for internet filtering and monitoring are in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
Staff will be alert to changes in pupils' behaviour.
The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger

- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

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

Serious violence

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

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

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

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

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.
If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
Visitors are expected to sign in to the school and wear a visitor's badge.
Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

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

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

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

Non-collection of children

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

- The child will stay with the Office team/SLT.
- During that time, every effort will be made to contact the parent/carer, or failing that, the emergency contact.
- In the case of a pupil not being collected and no contact being made by 4.45pm, the school will ring the Duty Social Worker to discuss the concerns and ask for advice.
- School will continue to try and contact the parent/carer/emergency contact.
- The member of SLT on duty will record the communication with Social Care and record details on CPOMS
- Consequent action will depend on advice from Social Care.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will following the guidance set out in Children Missing Education Statutory Guidance for Local Authorities 2016.

Each school will describe details of any additional local procedures. including information on contacting parents/carers, who will look after the child and how the incident will be recorded.

Appendix 5 School flow chart

Recognise – Respond - Refer

Protecting children is everyone's responsibility.

Designated Safeguarding team:
Lead (DSL)

Deputy (DDSL)

Designated Teacher for looked After Children

Safeguarding Link Governor:

(In the absence of the DSL, CP concerns are shared with the DDSL)

Recognise
Suspicion /concern?

Respond
Share verbally with **DSL or DDSL.**
Concern recorded on "safeguarding concern form" and given to **DSL or DDSL**
Or entered onto electronic system

DSL/DDSL reviews concern and makes a decision about next steps

Discuss the concern informally with the parents/carers, if appropriate.

Concerns about Adults
Concerns about staff:
Refer to Headteacher

Concerns about the Headteacher:
Refer to Androulla Nicou CEO.

Local authority Designated Officer:
020 8132 0370

Monitor the concern

Refer the concern to social care

Monitor

Relevant adult asked to monitor child and feedback to the **DSL/DDSL** within an agreed timescale.

Monitor

Discuss

DSL/DDSL discuss with "Early Help," or refer to social care.

Refer

Refer

DSL/DDSL may review decision with another senior leader or the head and agree to refer to social care. (Parent/carers informed of referral, unless this will put the child at more risk)

Record

DDSL keeps concern form in secure, confidential safeguarding file.

If any member of the safeguarding team is unavailable, staff should take advice directly from social care

NSPCC Whistleblowing Helpline 0800 028 0285

Education Support Helpline 08000 562 561

In an emergency call the police 999

Contact Details
Social Care Referrals:
020 8379 2506
After hours 020 8379 1000

Prevent/Channel Referrals:
020 8379 6137
DfE helpline
020 7340 7264

Appendix 6 TEDDY

TEDDY is a useful acronym on how to deal with a conversation of disclosure with a pupil.

T - Tell me what happened
E - Explain what you mean (so you are clear about people and events)
D - Describe what happened
D - Do not promise confidentiality
Y - Your responsibility is to contact designated staff

Procedures
What to do if someone discloses to you.
A pupil may choose to confide in any member of staff. Please remember:

- Yours is a listening role. Do not interrupt the child if he or she is recalling a significant event. Any questions that may be needed to clarify what the pupil is saying should be framed in an open manner and not lead the pupil in any way.

- Make a note of the discussion on the 'logging a concern' sheet as soon as possible (but within 24 hours). This must include the time, date, place and full names of anyone present as well as what was said – this could be used as evidence.

- Inform the designated member of staff as soon as possible and pass on the completed 'logging a concern' form. They will now take on the responsibility for any further action.

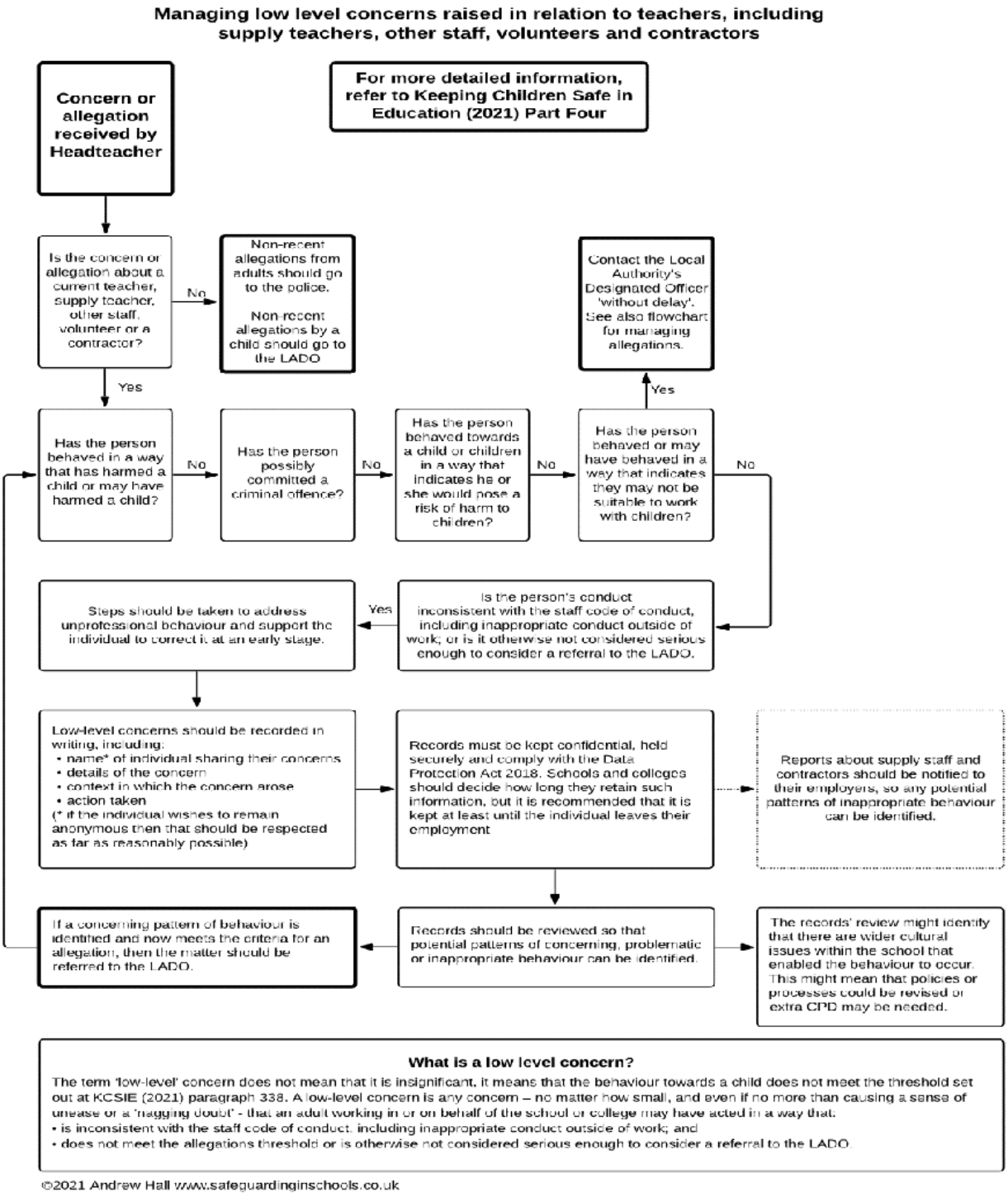
- Do not promise confidentiality. You have to pass this information on.

- If you have any doubts – always speak to a designated member of staff.

Appendix 7 Compulsory Safeguarding Training

Safeguarding Training			
What?	**Why?**	**When?**	**Who?**
School and H&S Induction Training	Mandatory	Prior to commencing in role/when returning from maternity leave or long term absence	All members of your staff community (including agency/temporary staff/ staff moving sites)
Awareness Raising Basic Child Protection	Statutory	Every three years	All members of your staff community (including Heads and SLT/long term agency staff)
Designated Safeguarding Lead Training	Statutory	Every two years	Any named member of your Designated Safeguarding and Child Protection Team (lead and Deputies)
Safer Recruitment Training	Statutory	3 years is best practice, maximum 5 years	At least one member of the appointment panel has undertaken training. Headteacher and HR lead.
Training about preventing terrorism	Statutory	No stipulated time for renewal - as required	All staff must have undertaken Prevent awareness training regarding the duty to prevent terrorism
Training on specific issues: FGM/CSE/Online Safety	Ofsted Inspection framework	No stipulated time for renewal - best practice every 2 years	All staff must have undertaken training on specific issues
Annual Child Protection Updates	KCSIE guidance	Annually	All staff members should receive safeguarding and child protection updates annually
Governing Bodies/Trust Boards	KCSIE guidance	No stipulated time for renewal - best practice 2 years	Governing bodies must ensure they comply with their duties under legislation
Online Safety Awareness	KCSIE guidance/Ofsted Inspection Framework	Annual basis - best practice Pupil Awareness/ Parent Awareness	Staff and pupils - understand risks posted by adults or peers who use the internet and strategies are covered to keep themselves safe

Appendix 8: Managing low level concerns



Appendix 9: Response to Reports of Child on Child Sexual Violence and Sexual Harassment (Duplicated in Connect Behaviour Policy)

*PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

REPORT RECEIVED
(from the victim or third-party)
[Onsite, offsite or online]

Definitions
Sexual Violence
Rape
Assault by penetration
Sexual assault

Sexual Harassment
Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

Victim reassured
- taken seriously and kept safe; and never be given an impression they are creating a problem
- confidentiality not promised
- listen to victim, non-judgementally
- record the disclosure (facts as reported)
- two staff present (one being the DSL, or reported to DSL as soon as possible)
- victim sensitively informed about referral to other agencies
- if victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see 'Keeping Child Safe in Education' paragraphs 473 - 475)
- parents of victim informed, unless this would put victim at greater risk.

Anonymity
Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in the school.

Record-keeping
Remember, to record all concerns, discussions, decisions and reasons for decisions.

Considerations
(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)
Immediately: Consider how to support the victim and the alleged perpetrator
- wishes of the victim
- nature of the alleged incident
- ages of the children
- development stage of the child
- any power imbalance
- one-off, or part of a pattern of behaviour
- any ongoing risks to victim or others
- other related issues and wider context (eg. CSE)

MANAGE INTERNALLY
One-off incidents which the school believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's behaviour policy or anti bullying policy.

EARLY HELP
Non-violent Harmful Sexual Behaviours
(see Harmful Sexual Behaviours Framework (NSPCC))

REFER TO SOCIAL CARE
All incidents where a child has been harmed, is at risk of harm or is in immediate danger.

Social Care staff will decide next steps. Be ready to escalate if necessary.

REFER TO POLICE
All incidents of rape, assault by penetration or sexual assault.
(incl. if perpetrator is 10 or under)
Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents.

RISK ASSESSMENT
For incidents of sexual violence there should always be an immediate risk assessment; for incidents of sexual harassment this will be on a case-by-case basis.
(for further details see 'Keeping Child Safe in Education' paragraphs 480 - 482 (DfE, 2022))

RISK ASSESSMENT
Immediately

Do not wait for outcome of referral before protecting victim.

Emphasis on victim being able to continue normal routines.

Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from school)
[Not a judgement of guilt]

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR
(see separate page)

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR
(see separate page)

DISCIPLINARY MEASURES TAKEN
(see school's Behaviour Policy/Anti-bullying Policy)

DISCIPLINARY MEASURES TAKEN
(may be undertaken based on balance of probabilities, unless prejudicial or unreasonable)

Ensure actions do not jeopardise the investigation
School to work closely with police and/or other agencies

CRIMINAL PROCESS ENDS
- **Conviction or Caution**: follow behaviour policy, consider Permanent Exclusion. If pupil remains in school, make clear expectations; keep victim and perpetrator apart. Consider victim's wishes.
- **Not Guilty**: Support victim and alleged perpetrator
- **No Further Action**: Support victim and alleged perpetrator

Source:
**Keeping Children Safe in Education September 2022 (DfE, 2022)*

2022 SVSH Flowchart.

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Appendix 10: Sample DSL School Poster **Designated Team for Safeguarding**

Poster included for format reasons however will be updated after new photos are taken

Safeguarding Team

Laura Pearce

Designated Safeguarding Lead (Headteacher)

Tanya Saunders

Designated Child Protection Lead (Assistant Head)

Hulya Zeki

Deputy Designated Safeguarding Lead (Deputy Head)

Melanie Bowman

Deputy Designated Safeguarding Lead

Ruth Nicholls

Deputy Designated Safeguarding Lead

Kathleen Cushnie

Deputy Designated Safeguarding Lead

Deborah Holding

Deputy Designated Safeguarding Lead (After School/Breakfast Club Manager)

Helen Brown

Safeguarding LGB Lead

If you are concerned for a child's health, welfare or safety in any way you must speak to one of the above members of the safeguarding team before you leave the school site. Do not question the pupil or try to secure evidence. Your responsibility is to report your concern, not to investigate.

If a pupil tells you something that suggests that they are at risk of harm, allow them to tell you as much as they wish. Please reassure the pupil that you have listened and that you must pass on the information to the safeguarding team.