

Safeguarding & Child Protection Policy & Procedures Stepney Primary School

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1 Amendments to this policy

Policy name change to Safeguarding and Child Protection

Throughout

- job titles updated
- LGBTQ+ replaced with lesbian, gay, bisexual or gender questioning

Section 2- Introduction and context

2.3.6- added detail to updated version of DfE doc Teaching online safety in school

Section 3 - Contextual safeguarding

section added to highlight the importance of extra familial safeguarding

Section 4- Safeguarding roles and responsibilities

4.4.14 - added paragraph providing clarity around leaders and governors responsibility under the Counterterrorism and Security Act 2015

4.5.22. added – reflective supervision as a supportive option.

Section 6 – Safeguarding processes and procedures

6.1.2. added in information about to who to report concerns about staff to for clarity

6.4.5 – added in emphasis to be professionally curious in relation to a child's behaviour as an indicator of a safeguarding concern

Section 7 - Types of safeguarding concerns

7.3.3 added to clarify that extreme views can also relate to the place of women and girls in society

7.10.1 – added reference to Brook Traffic Light (or similar) HSB assessment tool

7.15.7- added to require an annual review of online safety

7.17.2- added reference to risk assessment under the Prevent Duty

7.17.4 – added bullet points to clarify the filtering and monitoring and cyber security duties of the academy including in relation to generative AI

7.17.9 added reference to cyber security duties

7.21.1. added in requirement for DSL to regularly liaise with academy mental health lead

Section - 8 Attendance

8.1 'serious' added to the sentence for emphasis. Caring and other familial concerns added

8.3 'statutory' added for clarity of the status of the guidance referred to

8.14 Alternative Provision section added to reflect KCSIE update and publication of updated statutory DfE guidance

Section 9 -Recruitment of staff and volunteers

9.16 added to reflect updated safer recruitment requirements in relation to Alternative Provision



2 Key Contacts

y contacts		
Headteacher	Jo Atkinson	atkinsonj@thrivetrust.uk
The Designated Safeguarding Lead	Jo Atkinson	atkinsonj@thrivetrust.uk
The Deputy Designated Safeguarding Lead (s)	Ruth Brocklebank	brocklebankr@thrivetrust.uk
The Designated Lead for Children Looked After is:	Jo Atkinson	atkinsonj@thrivetrust.uk
Safeguarding governor:	Lee Morfitt	morfittl@thrivetrust.uk
The Special Educational Needs Coordinator is	Ruth Brocklebank	brocklebankr@thrivetrust.uk
The Director of Primary Education	Julia mitchell	mitchellj@thrivetrust.uk
Director of Safeguarding and Attendance	Becky Edlin	edlinb@thrivetrust.uk
Director of People	Beccy Meilhan	meilhanb@thrivetrust.uk
Trust Data Protection Officer	Rikki Barnett	barnettr@thrivetrust.uk
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EHASH	01482 448879 <u>CYP Hub</u>
Emergency Duty Team (Out of Hours)	01482 300304
Local Authority Designated Officers (LADO)	01482 790933 The Local Authority Designated Officer (LADO) — Hull Collaborative Partnership
Humberside Police (Public Protection Unit)	01482 356404



3 Introduction and context

3.1 Our responsibilities

Thrive Cooperative Learning Trust is committed to safeguarding children and expects everyone who works for the trust to share this commitment.

This policy sets out how Stepney Primary will deliver these responsibilities.

- 3.2 This policy **must** be read in conjunction with the statutory guidance documents 'Keeping children safe in education' (KCSIE) and 'Working together to safeguard children, a guide to multi- interagency working to help, protect and promote the welfare of children (WTTSC) and does not supersede those statutory documents.
- 3.3 All references to KCSIE and WTTSC are from the latest iterations of those documents which can be found on the GOV.UK website.
- 3.4 The school will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent school Standards)
 Regulations 2014 and the Education (Non-Maintained Special Academies)

(England) Regulations 2011, Keeping children safe in education: Statutory guidance for academies and colleges (September 2025) and 'Working together to safeguard children, a guide to multi-inter-inter-agency working to help, protect and promote the welfare of children 2023.

Nothing written in this policy overrides the school's duties under such legislation.

- 3.5 The governing body will oversee the policy, ensure its implementation, and review its content and effectiveness on an annual basis.
- 3.6 The Headteacher will report termly to the governing body on the school's safeguarding culture, implementation of this policy and the efficacy of the arrangements in place to keep children safe and promote their welfare.
- 3.7 Furthermore, we will follow the procedures set out by Hull City Council (Local Authority), Humberside Police, and the Humber and North Yorkshire Integrated Care Board (NHS)

4 Our principles

- Safeguarding is everyone's responsibility: all staff, governors, volunteers, and visitors are expected to play their full part in keeping children safe; and maintain an attitude of 'it could happen here';
- The welfare and safeguarding needs of children are put first;
- Everyone has a part to play in ensuring there is a strong safeguarding culture, which is deeply embedded in the ethos, values and everyday practices of the school.



5 The school

- 5.1 Provides a child-centered, caring, positive, safe, and stimulating environment that promotes the emotional, social, physical, and moral development of the individual child.
- 5.2 Provides an environment which helps children feel safe and respected.
- 5.3 Enables children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, particularly sexual violence, or sexual harassment.
- 5.4 Recognises that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected and may not recognise their experiences as harmful.
- 5.5 Recognises that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.
- 5.6 Ensures that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum in line with the DfE's 'Teaching online safety in school (updated January 2023) and UKCIS (United Kingdom Centre for Internet Safety) 'Education for a connected world' (June 2020).
- 5.7 Works with parents and carers to build an understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations, is understood.
- 5.8 Works constructively with safeguarding partners and agencies to ensure children receive the support they need, professionally challenging decisions where required and appropriate.

6 Scope

- 6.1 In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this school.
- 6.2 This policy applies to all members of Thrive Cooperative Learning Trust Central Team and staff in our schooo, including all permanent, temporary and support staff, supply staff, governors, volunteers, contractors and external service or activity providers.

7 Contextual Safeguarding

7.1 We recognise that as children grow and develop, they are influenced by a range of environments and people outside of their family, both in the real world and in the online world and may encounter risks in any of these environments. Sometimes these different contexts are interrelated and may mean that children may encounter multiple risks.



- 7.2 Through our day-to-day work and our safeguarding self -evaluation and review process we identify contextual and extra-familial safeguarding concerns and risks.
- 7.3 We work to understand and respond to children's experiences of harm beyond their families and recognise that the different relationships that children form in their neighbourhoods, school and online can feature harm, violence and abuse.

8 Safeguarding roles and responsibilities

8.1 All staff, volunteers and governors have responsibility for the following:

- 8.1.1 To provide a safe environment in which children can learn.
- 8.1.2. To identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.
- 8.1.3 To take appropriate action, working with other services as needed.
- 8.1.4 To keep themselves updated with the systems within the school which support safeguarding that were explained to them as part of their induction (including the Staff Code of Conduct). This includes knowing the role, and working with, the school's designated safeguarding lead.
- 8.1.5 To ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring) which is regularly updated.
- 8.1.6 To support social workers to take decisions about individual children when required.

8.2 All staff, volunteers and governors have responsibility for the following:

- 8.2.1 Knowing who the school's designated safeguarding lead (DSL) and deputy are.
- 8.2.2 Raising any concerns with the designated safeguarding lead and deputy immediately.
- 8.2.3 Ensuring that safeguarding concerns are reported immediately, and always on the same day and making comprehensive, clear, accurate and professionally written accounts that will stand up to scrutiny.
- 8.2.5 Being alert to the signs of abuse, including child on child abuse and their need to refer any concerns to the designated staff member.
- 8.2.5 Maintaining an attitude of 'it could happen here' and always act in the best interests of the child.
- 8.2.6 Listening to, and seeking out, the views, wishes and feelings of children.



- 8.2.7 Sharing information and working together to provide children with the help they need.
- 8.2.8 Referring to the Headteacher any concerns about another member of staff immediately, or if the concerns are about the Headteacher, referring them to the school's education director who will inform the trust Director of Safeguarding and Attendance, the chair of governors, and Director of Secondary or Primary where appropriate.
- 8.2.9 Raising concerns about poor or unsafe practice and potential failures in the school's safeguarding regime through the school's Whistleblowing Policy.
- 8.2.10 Being aware of Hull City Council local authority safeguarding procedures, https://childrensportallive.hullcc.gov.uk/web/portal/pages/professional and ensuring these procedures are followed.
- 8.2.11 Seeking early help where a child and family would benefit from coordinated support from more than one agency via Hull City Council Early Help and Safeguarding Hub (EHASH).
- 8.2.12 Knowing the school's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children.
- 8.2.13 Knowing the school's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.
- 8.2.14 Reading KCSIE part 1.

8.3 Local governing bodies and school leadership responsibilities

The Trust Board has overall responsibility and ultimate decision-making authority for all the work of the Trust. The Trust Board ensures that the trust complies with all legal and statutory requirements. The responsibilities of the Trustees and the Local Governing Body are outlined in the trust's scheme of delegation.

8.4 Headteachers and school governance

In line with KCSIE Headteachers and school governance are responsible for:

- 8.4.1 Reading, understanding and applying KCSIE and WTTSC statutory guidance.
- 8.4.2 Ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Code of Conduct, which are provided to all staff.
- 8.4.3 Ensuring all staff are given a mandatory induction, which includes clear guidance on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare.



- Ensuring that policies and procedures adopted by the Trust Board and Local Governing Body, particularly 8.4.4 concerning referrals of cases of suspected abuse and neglect, are understood, and followed by all staff.
- 8.4.5 Ensuring that the school has an appropriate senior member of staff from the school leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place); and that they receive DSL training which is updated every two years.
- 8.4.6 Ensuring that they are aware of and follow local procedures related to safeguarding.
- 8.4.7 Ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the school's IT system, but that 'over-blocking' does not lead to unreasonable restrictions.
- 8.4.8 Ensuring that the school has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards.
- 8.4.9 Ensuring that all staff and volunteers undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring).
- 8.4.10 Ensuring Trustees and Governors receive appropriate safeguarding and child protection (including online safety which includes an understanding of filtering, monitoring systems and cyber security) training at induction which is updated regularly and at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding and child protection.
- 8.4.11 Ensuring that they are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 including The Public Sector Equality Duty, and their local multi-agency safeguarding arrangements.
- 8.4.12 Ensuring they have appropriate level of security protection procedures in place in order to safeguard children, staff and systems and which meet the standards in 'Cyber security standards for schools and colleges' guidance. (updated March 2025).
- 8.4.13 Ensuring that the obligations under section 26 of the Counterterrorism and Security Act 2015 are met and that the Prevent Duty guidance for England and Wales is followed including the production of an annual written risk assessment.



8.4.14 Reading and referring to all of KCSIE.

8.5 The designated safeguarding lead is responsible for

- Taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- 8.5.2 Managing referrals from school staff or any others from outside the school.
- 8.5.3 Working with external agencies and professionals on matters of safety and safeguarding.
- 8.5.4 Undertaking relevant training and attending update sessions.
- 8.5.5 Liaising with the Headteacher to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019).
- 8.5.6 Raising awareness of safeguarding and child protection amongst the staff and parents and carers; and ensuring that child protection information is transferred to the child's new school/school.
- 8.5.7 Ensuring that the school has a nominated governor to liaise with the Education Director in the event of allegations of abuse made against the Headteacher.
- 8.5.8 Ensuring all staff receive the appropriate training, which is kept up to date.
- 8.5.9 Notifying the Children's Social Care department if there are concerns over unexplained absences of a child.
- 8.5.10 Informing the local authority when a private fostering arrangement is in place.
- 8.5.11 Managing security within the school and reviewing it annually.
- 8.5.12 Ensuring that important safeguarding policies, such as those for behaviour and anti-bullying, are kept up to date.
- 8.5.13 Keeping all child protection records up to date on CPOMS (Child Protection Online Management System); including a clear summary of the concern, decisions reached and the rationale behind the decision, including details of how the concern was resolved/outcomes.
- 8.5.14 Having an overview of the numbers of safeguarding and child protection referrals made and the success rate of any such referrals, and provide an anonymised report to the Headteacher, and governing body termly.



- 8.5.15 Having in place effective ways to identify emerging problems and potential unmet needs for individual children and families.
- 8.5.16 Ensuring that there is a planned programme of evidence based, inclusive, age and stage appropriate, RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum and which complies with statutory guidance.
- 8.5.17 Ensuring through the safeguarding curriculum that children know the process of raising a concern (about themselves or a friend/other), that they know the school's Designated Safeguarding Lead (and deputy), and are aware of other support mechanisms such as ChildLine etc.
- 8.5.18 Ensuring at least one person on any appointment panel has undertaken safer recruitment training which is renewed every two years.
- 8.5.19 Ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised.
- 8.5.20 Ensuring procedures are in place to handle allegations against members of staff and volunteers.
- 8.5.21 Ensuring there are procedures in place to handle allegations against other children.
- 8.5.22 Ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the school and externally through counselling, and/or reflective supervision and/or other services.
- 8.5.23 Creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the school's development.
- 8.5.24 Taking lead responsibility for promoting the educational outcomes for children who have or have had a social worker.
- 8.5.25 Making this policy available to parents and carers as appropriate.
- 8.5.26 Ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- 8.5.27 Ensuring all staff have regular reviews of their own practice to ensure they improve over time.
- 8.5.28 Ensuring any paper records are secure and kept separately from the child's main file in a locked location.



- 8.5.29 Fulfilling their duties in line with KCSIE Annex C.
- 8.5.30 Reading and referring to all of KCSIE, WTTSC parts 2.4 and 5 and the Local Authority threshold information.

9 Compliance and quality assurance

- 9.1 Thrive Cooperative Learning Trust will maintain high standards of safeguarding through clear processes for quality assurance, compliance reporting, and continuous improvement.
- 9.2 We will use data, intelligence, and feedback, including the voice of the child, to ensure children receive effective support, to assess and reduce risks, to provide assurance to governance bodies, and improve safeguarding practice.
- 9.3 Quality assurance will include self-evaluation by academies, independent reviews, and ongoing training and guidance from the Central Team.
- 9.4. Non-compliance will be managed in line with Trust procedures, with referral to external agencies where appropriate.

10 Safeguarding processes and procedures

The school will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Hull City Council safeguarding partners policies and procedure guidance.

10.1 How to report any concerns

- 10.1.1 Clear procedures on the reporting of any concerns are given to all staff/volunteers in the school. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training. These procedures can be found in the school office.
- 10.1.2 All concerns should be reported in writing, using CPOMS. If CPOMs is temporarily unavailable the school 'back up' paper procedures should be used. Concerns should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern report. Concerns about a member of staff should be reported immediately to the Headteacher. Concerns about the Headteacher should be reported to the school's Director of Education or the Director of Safeguarding and Attendance. The Directors will ensure that both the Trust CEO and the Chair of Governors are informed.
- 10.1.3 All child protection and/or safeguarding concerns should be reported to the Designated Safeguarding Lead. See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the school.
- 10.1.4 Failure to follow these reporting procedures may result in disciplinary action.



10.2 Taking action

- 10.2.1 If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Hull City Council Emergency Duty Team 01482 300304, or Humberside Police (Public Protection Unit) 01482 356404 or call 999 if you are concerned a child needs immediate protection.
- 10.2.2 If the child has an injury which requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.
- 10.2.3 The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

10.3 Children's disclosure of abuse

- 10.3.1 At Stepney Primary School we have a clear procedure for reporting concerns. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the child know that the staff member must pass the information on to the safeguarding team (DSL) to offer the proper support that the child requires. Staff members will allow them to speak freely and will not ask investigative questions.
- 10.3.2 Staff will be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. Staff will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.
- 10.3.3 The staff member will tell the child what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed.
- 10.3.4 Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends, or family unless necessary for the welfare of the child.

10.4 Suspecting that a child is at risk of harm

- 10.4.1 There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the child the opportunity to talk.
- 10.4.2 Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead and record their concerns on CPOMS.
- 10.4.3 All staff should be aware that children can abuse other children (child on child abuse) and that it can happen both inside and outside of school and online.



- 10.4.4 Staff will be aware of the harm caused by child-on-child abuse including sexual violence or harassment and recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.
- 10.4.5 Staff will use the school's Anti-Bullying Policy and/or Behaviour Policy where necessary. However, when considering a child's behaviour all staff must be professionally curious and make a judgement as to any possible underlying safeguarding concerns.
- 10.4.6 There will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying/behaviour procedures.
- 10.4.7 For all children displaying challenging behaviour and bullying, the DSL must be included in decisions about consequences to determine any safeguarding risks.
- 10.4.8 The school acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be vulnerable.

10.5 Notifying parents and carers

- 10.5.1 The school will normally seek to discuss any concerns about a child with their parents and carers. The Designated Safeguarding Lead, or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure.
- 10.5.2 However, if the school believes that notifying parents and carers could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from the Trust Director of Safeguarding and Attendance and /or Children's Social Care.

10.6 Referral to children's social care

- 10.6.1 The Designated Safeguarding Lead or deputy will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm.
- 10.6.2 The child (subject to their age and understanding) and the parents and carers will be told that a referral is being made, unless to do so would increase the risk to the child.

10.7 Private fostering

10.7.1 The school will notify the local authority where we are aware or suspect that a child is subject to a private fostering arrangement.



- 10.7.2 Schools have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children (private Arrangements for Fostering Regulations 2005 and must be made in writing.
- 10.7.3 School staff should notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements.
- 10.7.4 On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

10.8 Reporting directly to child protection agencies

- 10.8.1 Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police, or the NSPCC if:
 - The situation is an emergency and the Designated Safeguarding Lead, their deputy, the Assistant Headteacher and the Headteacher are all unavailable;
 - They are convinced that a direct report is the only way to ensure the child's safety.

10.9 Early help

- 10.9.1 Early help is support for children of all ages which improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. Some early help is provided through "universal services" such as education and health services. They are universal services because they are available to all families, regardless of their needs. Other early help services are coordinated by a local authority and/or their partners to address specific concerns within a family and can be described as targeted early help. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention.
- 10.9.2 Staff and volunteers working within the school should be alert to the potential need for early help for children. Staff and volunteers should be alert to children with additional vulnerabilities who may benefit from Early Help.

11 Types of safeguarding concerns

11.1 Types of abuse and neglect

This section must be read in conjunction with KCSIE Annex A and B

11.1.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children.



- 11.1.2 All staff must know what the different signs of abuse are and be alert to those signs.
- 11.1.3 All staff must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm.
- 11.1.4 All staff will receive ongoing training regarding types of abuse including local and national context.
- 11.1.5 The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.
- 11.1.6 Further information and resources can be found in annexes A, B and part 5 of KCSIE.

11.2 Specific safeguarding Issues

- 11.2.1 All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.
- 11.2.2 Staff must be aware of the signs of a variety of specific safeguarding issues as outlined in KCSIE, e.g. Child Criminal Exploitation- CCE (including County Lines), Child Sexual Exploitation- CSE, serious violence, so called 'Honour' Based Abuse (HBA), Female Genital Mutilation FGM, Forced Marriage, Breast Ironing and know what to do if they have a concern.

11.3 Preventing radicalisation

- 11.3.1 The Counter-Terrorism and Security Act, 2015, places a duty on childcare, education and other children's services providers, to have due regard to the need to prevent people from being drawn into terrorism "the Prevent duty".
- 11.3.2 The school has a Prevent risk assessment in place, updated annually which has been ratified by the LGB.
- 11.3.3 Where staff are concerned that children are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS. This can include extreme views on the role of women and girls.
- 11.3.4 The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

11.4 Channel

11.4.1 When it is appropriate the DSL will make a referral to the Channel programme.



- 11.4.2 We use the curriculum to ensure that children understand how people with extreme views share these with others to radicalise others, especially using the internet.
- 11.4.3 We are committed to ensuring that our children are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just, and civil society.

11.5 Child on child abuse

- 11.5.1 All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online.
- 11.5.2 All staff must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual harassment.
- 11.5.3 All staff must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.
- 11.5.4 Staff must be vigilant and if they have any concerns they should speak to the DSL or deputy DSL.
- 11.5.5 We will minimise the risk of all types of child-on-child abuse through a multi-faceted safeguarding approach built on a zero-tolerance culture towards all forms of abuse, including bullying and inappropriate sexualised behaviour. This involves comprehensive staff training to ensure all adults can recognise the signs of peer abuse—which can be physical, emotional, or sexual—and know the clear procedures for immediate reporting to a Designated Safeguarding Lead. Staff are trained to meet the needs of vulnerable pupils including those with Special Educational Needs (SEN) or a disability who may have communication barriers, reduced understanding of risk, or higher reliance on others, requiring targeted support and accessible reporting routes. The school actively promotes inclusion and anti-bullying messages that specifically challenge homophobic, biphobic, and transphobic language and behaviour.

The curriculum embeds Relationships Education and Personal, Social, Health and Economic (PSHE) lessons tailored to the age group, teaching children about healthy relationships, personal boundaries and the importance of speaking out to a trusted adult. The school also maintains a vigilant physical environment and promotes systems where children can safely and discreetly report concerns, ensuring that every child's voice is heard and that all incidents are recorded, thoroughly investigated, and dealt with quickly and consistently, with appropriate support offered to both victims and those who have caused harm.

- 11.5.6 All staff must challenge inappropriate behaviours between children including, but not limited to:
 - Bullying (including online bullying, prejudiced based and discriminatory bullying, inappropriate touching);
 - Abuse in intimate personal relationships between peers;



- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threats and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent which may also include an online element;
- Sexual harassment such as sexual comments, remarks, jokes, and online harassment, which may be standalone or part of a broader pattern of abuse;
- Consensual and non-consensual sharing of nudes/semi nudes images and or videos (also known as sexting
 or youth produced sexual imagery);
- Up skirting 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.
- 11.5.7 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

11.6 Harmful sexual behaviour (HSB)

- 11.6.1 This section of the policy must be read in conjunction with KCSIE Part 5 and the guidance in that section followed when responding to harmful sexual behaviour incidents.
- 11.6.2 We recognise that sexual behaviours exist on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. It can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 11.6.3 We also recognise that HSB can occur online and face to face (both physically and verbally) and is never acceptable.
- 11.6.4 We will ensure that all children are taught, in an age-appropriate way, about sex, relationships and consent and understand that the law is in place to protect children rather than criminalise them.

11.7 Sexual violence and sexual harassment

- 11.7.1 The school has a zero-tolerance approach to sexual violence and sexual assault. It is never acceptable, will not be tolerated and will never be passed off as 'banter' 'just having a laugh' 'part of growing up' or 'boys being boys'.
- 11.7.2 The school will maintain an approach of what is happening here and may be well hidden from adults.



11.8 Responding to reports of sexual violence and sexual harassment

- 11.8.1 Our approach will be to support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.
- 11.8.2 We will ensure that we maintain an awareness of intra familial harms and support is provided for siblings following incidents where reported.
- 11.8.3 Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.
- 11.8.4 All staff will be trained in how to manage a report.
- 11.8.5 The school recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

11.9 Risk assessment

- 11.9.1 Where there has been a report of sexual violence the DSL or deputy will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.
- 11.9.2 Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the school. The school will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.
- 11.9.3 Any relevant action under the school behaviour policy will be considered.
- 11.9.4 Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.
- 11.9.5 The risk and needs assessment will consider:-
 - The victim, especially their protection and support;
 - Whether there may have been other victims;
 - The alleged perpetrator(s);
 - All the other children (and, if appropriate adults and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harm.

11.10 Action following a report of sexual violence and/or sexual harassment

11.10.1 When a report has been received the DSL or deputy will consider the following:



- The wishes of the victim;
- The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children;
- If the alleged incident is a one off or a sustained pattern of abuse;
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- If there are any ongoing risks to the victim, other children, or staff;
- Intra familial harms;
- Support for siblings at the school;
- Other related issues and the wider context including links to CSE and CCE;
- Making an assessment of the behaviours using the Brook Traffic Light Tool (or equivalent HSB assessment tool).
- 11.10.2 Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s), and any other children involved or impacted.
- 11.10.3 The DSL will consider 4 options when managing a report.
 - Manage the report internally;
 - Provide support through the local Early Help process;
 - Make a referral to Children's Social Care;
 - Report to the police.
- 11.10.4 All concerns, discussions, decisions, and reasons for decisions will be recorded on CPOMS.
- 11.10.5 The school will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.
- 11.10.6 If a report is assessed as being unsubstantiated, unfounded, false, or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to children's social care. An Early Help process may be initiated.
- 11.10.7 If a report is deliberately invented or malicious, the school will consider what disciplinary action is appropriate as outlined in the behaviour policy.
- 11.11 Ongoing response safeguarding and supporting the victim
- 11.11.1 The following principles will help shape and decisions regarding safeguarding and supporting the victim:



- The needs and wishes of the victim will be paramount.
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse.
- The victim will never be made to feel they are the problem or made to feel ashamed.
- Proportionality of response. Support will be tailored on a case-by-case basis.
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental, and sexual health problems and unwanted pregnancy.

11.12. School Procedures

11.12.1 All staff use the CPOMs reporting system for recording any safeguarding or welfare concerns. Staff are trained to ensure that these logs are accurate, factual and include the voice of the child wherever possible. The DSL and Deputy DSL are both alerted immediately to these logs. The DSL/DDSL evaluate each report using a child centred approach, and decide what (if any) action needs to be taken. Action is taken in a timely manner with the child's safety being paramount. Information is shared on a 'need to know' basis. Actions may include further monitoring, discussions with parents, in school support or referrals to external services.

11.13 Domestic abuse and children

- 11.13.1 This form of abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.
- 11.13.2 Children can be victims of domestic abuse and as victims have protection and rights under the law. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
- 11.13.3 We encourage children to come forward by raising awareness of the issue and teaching the children about health relationships through SRE, the wider curriculum and modelling behaviour in the school.

11.13 Adolescent to parent violent abuse (APVA)

11.14.1 APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

11.15 Digital safeguarding (also known as online safety/E-safety)

11.15.1 We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant policies. In addition, we will consider digital safeguarding whilst planning the curriculum, staff training, the role of the DSL and parental engagement.



- 11.15.2 Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.
- 11.15.3 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors;
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones');
- Set clear guidelines for the use of mobile phones for the whole school community;
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

11.15.4 The 4 key categories of risk

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

- Content being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Contact being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce risks such as online gambling, inappropriate advertising, phishing and/or financial scams
- 11.15.5 We will keep our digital safeguarding processes and procedures under review using an independent tool such as the SWgFL 360 safe process.
- 11.15.4 Our ICT Acceptable Use policy is signed up to by all children and staff annually.
- 11.15.5 If a child, parent/carer, or member of staff has a concern relating to online safety children are encouraged to report it. They can report it directly to a member of the safeguarding team at the school.



- 11.15.6`Through our regular communication with parents and carers, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor online use, explain what children are being asked to do online including sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online.
- 11.15.7 We will conduct an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face

11.16 Photography and images:

11.16.1 To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- Seek parental consent;
- Use only the child's first name with an image;
- Ensure children are appropriately dressed;
- Encourage children to tell us if they are worried about any photographs that are taken of them;
- Remove photographs where requested;
- Only use school equipment when taking photographs of children;
- Comply with GDPR.
- 11.16.2 Parents, carers, or relatives may only take still or video photographic images of children in the school or on school-organised activities with the prior consent of the school and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected. As part of our admissions process, parents complete a Photo Consent Permissions Form to indicate their preference. We also include a Photo Consent box on all our visit forms. All personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill. Our Data Protection Policy is available on our website.

11.17 Filtering, monitoring and cyber security

- 11.17.1 The school will limit children's exposure to risks from the school's IT system.
- 11.17.2 The school has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings and are informed by the school's risk assessment required by the Prevent Duty.
- 11.17.3 The school will ensure that 'over blocking' does not lead to unreasonable restriction as to what children can be taught with regard to online teaching and safeguarding.

11.17.4 The school will



- Identify and assign roles and responsibilities to manage filtering and monitoring systems;
- Review filtering and monitoring provision at least annually;
- Block harmful and inappropriate content without unreasonably impacting teaching and learning;
- Have effective monitoring strategies in place to meet safeguarding needs;
- Follow the DfE guidance on filtering and monitoring requirements as they apply to generative AI;
- Follow DfE guidance on the Prevent Duty, cyber security standards and filtering and monitoring standards for schools.
- 11.17.5 The school will conduct regular, at least termly, tests of the filtering and monitoring provision in the school and report on findings to the governing body.
- 11.17.6 All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.
- 11.17.7 We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.
- 11.17.8 Digital safeguarding may be addressed through, during lessons, specialised digital safeguarding sessions, PHSE, flexi-learning weeks and assemblies and use of the INEQ Safer Schools app.
- 11.17.9 There are appropriate levels of security protection procedures in place in order to safeguard children, systems and staff
- 11.18 Sharing of nudes and semi-nudes (also known as youth produced sexual imagery/sexting/ non-consensual sharing of images)
- 11.18.1 Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.
- 11.18.2 In dealing with cases of sending of nudes, semi-nudes etc the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.
- 11.18.3 To reduce the likelihood of the sharing of nudes/semi nudes we will:
 - Outline our expectations and explain the rules of having a mobile, tablet or smartphone;
 - Expect all staff and children to sign an acceptable use policy;
 - Educate, in an age and stage appropriate way, about how to stay safe and the law in relation to sending; and receiving of nudes/semi-nudes;
 - Encourage children to report concerns to an adult;



Ensure adults share concerns with the DSL.

11.18.4 When a child has been affected by the sending of an explicit image staff will:

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this;
- Recognise that they themselves may feel shocked, upset, angry, confused, or disappointed while listening to the child;
- Give themselves time to process the information, remembering that the child will be watching their reactions;
- Reassure the child that they are not alone;
- Listen and offer support they are probably upset and need help and advice, not criticism;
- Not shout or make them feel like it is their fault;
- Will not ask questions like "why have you done it?" as this may stop them from opening up;
- Discuss the problem and the wider pressures that they may face, to help them to understand what has happened and understand any wider safeguarding concerns;
- Assure the child that they will do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to the staff member.

11.18.5 If a child has shared an explicit image, the DSL or deputy will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else:
- Support the victim to get the images removed by contacting the Internet Watch Foundation;
- Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case;
- Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal;
- Contact the DSL at the relevant school if the image was requested by a school aged child not from this school, to raise awareness of potential wider safeguarding issues or circulation of the image in their school;
- All actions and information to be logged on CPOMS;
- Parents and carers to be contacted as appropriate.

11.18.6 If a child has been sent a sexually explicit image:

- The DSL or deputy should ask them if they know the person who sent it and their age;
- If the image was sent by another child, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media;
- The DSL will consult the UKIS sharing nudes and semi nudes advice Sharing nudes and semi-nudes: how to respond to an incident (publishing.service.gov.uk);



- If the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process;
- All actions and information to be logged on CPOMS;
- Parents and carers to be contacted as appropriate.

11.18.7 Staff must **not**:

- View, copy, print, share, store or save images;
- Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL);
- Delete the images or ask the child to delete them;
- Ask the child/children who are involved in the incident to disclose information regarding the image (this is the DSL's responsibility).

11.19 Upskirting

- 11.19.1 Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- 11.19.2 Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlined within this policy and where appropriate staff will also consult the behaviour policy.

11.20 Homelessness

- 11.20.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- 11.20.2 It is recognised that in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.
- 11.20.3 Children's services will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

11.21 Children with special educational needs (SEN) and disabilities

11.21.1 All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs



co-ordinator, the behaviour lead, the mental health lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.

- 11.21.2 If staff have a concern for a disabled child, they must consider:
 - The child's communication needs and how they can communicate effectively with them;
 - What information in relation to the child disability and special needs staff need to be aware of in order to assess risk of abuse;
 - What resources staff require in order to undertake an informed assessment of safeguarding risk;
 - Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition;
 - Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled children.

11.22 Mental health

- 11.22.1 All staff should be aware that 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.
- 11.22.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 11.22.3 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.
- 11.22.4 We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Staff are trained to spot the early warning signs of common mental health difficulties in children, such as changes in behaviour, attendance, or emotional state. Our SENCO will oversee a clear referral process —from initial class teacher concern, to in-school support like nurture groups, to specialist external referral such as CAMHS. This work includes good liaison with parents throughout.
- 11.22.5 We seek to embed positive mental health and mental health awareness through our school to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes, assemblies and MHST workshops.



11.22.6 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

11.23 Children who are lesbian, gay, bisexual or gender questioning

- 11.23.1 Children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender questioning.
- 11.23.2 Staff will endeavour to reduce the additional barriers lesbian, gay, bisexual or gender questioning children face and provide a safe space for them to speak out or share their concern with members of staff.
- 11.23.3 The school will actively encourage lesbian, gay, bisexual or gender questioning children to share their lived experience and views in order to inform practice.

12 Attendance

This section must be read in conjunction with the school attendance policy

- 12.1 Lack of or erratic attendance, persistent or severe absence is a serious safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual and child criminal exploitation particularly county lines. It may also be an indication of child-onchild abuse including bullying and sexual harassment, significant mental ill health concerns, caring responsibilities and/or other familial concerns. It must not be seen as an isolated concern.
- 12.2 Absence from education may increase known safeguarding risks.
- 12.3 We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references statutory guidance Working together to improve school attendance and other guidance including Children Missing Education.
- 12.4 Further information and support for academies can also be found in the Government's 'Missing Children and Adults A cross government strategy' (publishing.service.gov.uk), Full time enrollment of 14-16 year olds in Further Education and Sixth Form Colleges.
- 12.5 We have a named senior leader with strategic responsibility for attendance.
- 12.6 School attendance operational leads, in addition to the general safeguarding training that all staff receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.



- 12.7 School leaders and governors ensure that attendance data, particularly for identified vulnerable groups, is closely and regularly monitored, identifying trends or patterns which may indicate safeguarding concerns.
- 12.8 Where appropriate, social workers will be involved, informed, and updated about attendance issues.
- 12.9 Safe and well checks are carried out on children who are absent, based on a vulnerability risk assessment.
- 12.10 The school remains responsible for the safeguarding of children placed at any alternative provision.

12.11 Children missing education (CME)

- 12.11.1 Children who go missing from education are at significant risk. Children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority (looked after children) are additionally vulnerable and in need of additional protection.
- 12.11.2 We will follow the protocols laid out in our attendance policy.
- 12.11.3 The DSL will ensure the school's response to identifying children missing from education supports identifying potential abuse or exploitation and prevents them from going missing in the future.
- 12.11.4 The school will ensure compliance with the guidance and regulations contained in the appropriate sections KCSIE and Working Together to Improve School Attendance (19th Aug 2024).

12.12 Elective home education (EHE)

12.12.1 We will follow the protocols laid out in our attendance policy.

12.13 Children with medical conditions who cannot attend school

12.13.1 We will follow the protocols laid out in our attendance policy.

12.14 Alternative Provision

- 12.14.1 Where the school places a child with an alternative provision provider, we continue to be responsible for their safeguarding.
- 12.14.2 We will follow the DfE statutory guidance for Alternative Provision and for Education where children with health needs who cannot attend school.
- 12.14.3 We will ensure that a robust and continuing due diligence and review process is in place which includes:
 - Ensuring the placement meets the child's needs;
 - Assessing any additional risks of harm that the child may be vulnerable to due to any complexity of need;



- Obtaining written information from the alternative provider that appropriate safeguarding checks have been carried out on all individuals working at their establishment and assurance that the provider will notify the school of any staffing changes;
- Obtaining written information from the provider of any arrangements which may put a child at risk;
- Obtaining records of the address of the provider and any subcontracted provision or satellite sites the child may attend and ensure that we know where the child is based during the school day;
- At least half termly review the provision, including obtaining the child's authentic voice to ensure the placement continues to meet needs;
- Obtaining daily attendance information from the provider;
- Ensuring that when safeguarding concerns arise the placement is immediately reviewed and terminated, if necessary, unless or until concerns have been satisfactorily addressed.

13 Recruitment of staff and volunteers

- 13.1 The school will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.
- 13.2 Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.
- 13.3 As part of our due diligence, we will carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues which can be explored at interview.
- 13.4 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school.
- 13.5 We will ensure that any alternative provision facility, contractor, or agency working with the school provides us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.
- 13.6 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.
- 13.7 We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.



- 13.8 The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The school will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.
- 13.9 The types of checks undertaken will be in accordance with the guidance given KCSIE.
- 13.10 Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in KCSIE.
- 13.11 Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.
- 13.12 The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.
- 13.13 The school will keep a single central record in accordance with the regulations given KCSIE.
- 13.14 Recruitment and/or deployment checks will be undertaken as stated in KCSIE.
- 13.15 The school will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.
- 13.16 The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

14 Dealing with allegations against staff and volunteers which meet the harms threshold

- 14.1 We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with KCSIE. The school will maintain ongoing vigilance of all adults working in or visiting the school.
- 14.2 The school holds a comprehensive Thrive Code of Conduct Including Low Level Concerns Policy which outline in detail expected standards of adult behaviour and procedures to take where there are concerns.



- 14.3 Where a child makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately.
- 14.4 Parents and carers will be contacted as soon as reasonably possible. The child will be offered support, and their wishes will be carefully considered before any actions are carried out.
- 14.5 Where any member of the school staff, volunteer, governor, or visitor has concerns that the conduct of an adult has met the harm threshold, they must report those concerns immediately.
- Any concerns about the Headteacher should go to the school's Director of Education and Director of Safeguarding and Attendance and the Director of People who can be contacted by their email addresses at the top of this policy. The education director will ensure that both the Trust CEO and the chair of governors is informed.
- 14.7 If for any reason you cannot make a referral through these routes the school has a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here:
 - 01482 790933
 - The Local Authority Designated Officer (LADO) Hull Collaborative Partnership
- 14.8 Under its duty of care for its employees, the school will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The school will ensure its obligations for confidentiality when an allegation has been made.

14.9 Concerns or allegations that do not meet the harm threshold/low level concerns

All staff, governors, volunteers and visitors will be made aware of what constitutes a low level concern and that all low-level concerns must be shared responsibly with the Headteacher or DSL.

15 Safeguarding training for all staff and children

- 15.1 Every year all staff (including non-teaching and volunteers) must undertake a variety of Child Protection and Safeguarding training including on KCSIE. This training will be informed by national and local context as well as identified gaps in knowledge and understanding.
- 15.2 Training is recorded and logged. All staff are informed clearly as to how to report anything of concern immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the school to customise as required.
- 15.3 All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, online safety, including filtering and monitoring and familiarisation with the safeguarding and child



- protection policy, KCSIE, WTTSC, whistleblowing policy, behaviour policy, anti-bullying policy staff code of conduct, systems and processes for CME and other related policies.
- 15.4 The designated safeguarding lead will undergo DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.
- 15.5 All staff members of the school will undergo safeguarding and child protection training (whole school training) which is regularly updated.
- 15.6 All governors must undergo governor specific online awareness training at least every two years.
- 15.7 Staff members who miss the whole-school training should notify the DSL and will be required to undertake other relevant training to make up for. It is the responsibility of each member of staff to ensure they have completed all mandatory safeguarding training.
- 15.8 We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.
- 15.9 The designated safeguarding lead will provide an annual briefing to the school on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.
- 15.10 The DSL will ensure the school maintains accurate records of staff induction and training.

16 Establishing a safe environment in which children can learn and develop

16.1 Anti-bullying

- 16.1.1 All staff must follow the anti-bullying policy which is published on the school website.
- 16.1.2 The school employs several straightforward strategies to raise awareness of bullying. We routinely hold assemblies and lessons—often through the Personal, Social, Health and Economic (PSHE) curriculum—that define what bullying is (including different types like verbal, physical, and cyber), explain its negative impact, and teach children how to recognise it. We actively participate in National Anti-Bullying Week to focus discussions and activities around the issue. We communicate our anti-bullying policy clearly and simply to both students and parents through the use of our STOP posters Several Times on Purpose, Start Telling Other People. We ensure everyone knows how to report incidents and assure students and parents that all reports will be taken seriously and acted upon promptly.
- 16.1.3 If any child / member of staff / parent / carer has a concern about bullying, they should report it to: The Headteacher, Assistant Headteacher, the relevant class teacher or any member of staff.



17 Confidentiality and sharing information

- 17.1 Staff should only discuss concerns with the designated safeguarding lead, Headteacher, or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.
- 17.2 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 17.3 The school will use the DfE Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents, and carers May 2024 to inform and support their approach to information sharing.
- 17.4 All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.
- 17.5 Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term.

17.6 Storage and handling of records

- 17.6.1 Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the UKGDPR (2018) and the school's Data Protection Policy.
- 17.6.2 The school will use the DfE 'Data Protection in Schools' April 2024 to inform and support their approach to information sharing.
- 17.6.3 Any paper record of concern forms and other written information will be stored in a locked facility accessed only by the Headteacher and designated safeguarding lead. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen.
- 17.6.4 Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or school they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.



- 17.6.5 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children, parents and carers do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the Headteacher or Designated Safeguarding Lead. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.
- 78.6.6 We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UKGDPR
- 17.6.7 When unsure, we will contact the trust's Data Protection Officer and/or the Director of Safeguarding and Attendance.

18 Use of school premises for non-school activities

- Where the school premises are hired or rented out the school leadership will ensure that appropriate 18.1 arrangements are in place to keep children safe.
- 18.2 The school policies will apply where the services or activities are provided by the school and are under the direct supervision or management of school staff.
- 18.3 Where services or activities are provided separately by another body, the governors and school leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.
- 18.4 This applies whether or not the children who attend any of these services or activities are children on the school roll.
- 18.5 The school leadership and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 18.6 The guidance found in 'Keeping children safe in out-of-school settings' details the safeguarding arrangements that the school should expect these providers to have in place.



Appendix 1 Raising safeguarding concerns about a child

(this outline cannot cover every eventuality – all cases will keep the best interests of the child at the heart of any decision)



