Safeguarding & Child Protection Policy

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Table of Contents

1. Ethos statement
2. Introduction
3. Statutory framework
4. Key roles and responsibilities
5. Induction & Training
6. Recognising concerns – signs and indicators of abuse
7. Specific safeguarding issues
8. Children potentially at greater risk of harm
9. Curriculum
10. Online safety and filtering & monitoring
11. Procedures
12. Information sharing, record keeping and confidentiality
13. Managing allegations made against teachers, including supply teachers, trainee teachers, other staff, volunteers and contractors.
14. Use of school premises for non-school activities
15. Whistleblowing
16. Useful contacts and links
17. Appendix A – recording form for safeguarding concerns or guidance for raising concerns on school's safeguarding management system further information on specific safeguarding issues
18. Appendix B – body map
19. Appendix C - Allegations against Staff including Low level concerns policy
20. Appendix D – Linked School Policies and Procedures

School Child Protection and Safeguarding Policy Framework

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.
Keeping Children Safe in Education.

1. Ethos statement

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children. We aim to provide a safe and welcoming environment in which children can learn, underpinned by a culture of openness where both children and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe.

2. Introduction

The governing body/proprietor[1] recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Buckinghamshire Safeguarding Children's Board.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the
- home, including online
- preventing 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
- taking action to enable all children to have the best outcomes

This policy is for all staff, parents, governors, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, Online Safety Policy, Behaviour and

[1] In maintained schools the governing body is responsible for ensuring their functions are exercised with a view to safeguarding and promoting the welfare of children in accordance with section 175 of the Education Act 2002, for pupil referral units it is the management committee, in independent schools, including academies and free schools, and 16-19 academies, this duty sits with the proprietor (in the case of academies the proprietor will be the academy trust). References to the governing body throughout this policy framework includes management committees.

Anti-Bullying Policy, school's guidance on low-level concerns[2], Child-on-Child Abuse Policy and procedures, and Part Five of KCSiE, copies of which will be provided to all staff on induction. A full list can be found in Appendix D

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people, and ensure that all staff understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The governing body/proprietor expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working in school **must**, as a minimum, have read and understand Part One of KCSiE and Part Five: Child-on-child sexual harassment and sexual violence. Governors/the proprietor will ensure that they and senior leaders have read and understand Parts One and Two of KCSiE.

The governing body/proprietor will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated. The governing body/proprietor will ensure that all governors and trustees receive appropriate safeguarding and child protection training (including online) at induction which is regularly updated.

Compliance with the policy will be monitored by the Headteacher, designated safeguarding lead (DSL) and named safeguarding governor/proprietor.

3. Statutory framework

Section 175 of the Education Act 2002 (as amended) in the case of maintained schools and pupil referral units[3], Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools (including academies and free schools), the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) for post 16 education providers, place a statutory duty on governing bodies and proprietors to have policies and procedures in place that safeguard and promote the welfare of children and young people who are pupils of the school which must have regard to any guidance given by the Secretary of State.

In accordance with statutory guidance, Working Together to Safeguard Children, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint duty for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Buckinghamshire, all schools have been named by the Buckinghamshire Safeguarding

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[2] Guidance on Low-Level Concerns may be a stand alone policy or included within another policy e.g. Staff Code of Conduct

[3] Section 175, Education Act 2002 – for management committees of pupil referral units, this is by virtue of regulation 3 and paragraph 19A of Schedule 1 to the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007

Children's Partnership (BSCP) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the BSCP which can be found on their website at: Home - Buckinghamshire Safeguarding Children Partnership

4. Key roles and responsibilities

Governing Body/Proprietor

The governing body/proprietor has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The governing body/proprietor has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare. The governing body/proprietor will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The governing body/proprietor will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The governing body/proprietor will ensure that where there is a safeguarding concern school leaders will make sure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The governing body/proprietor will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The governing body/proprietor will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of children and young people as appropriate:

- child-on-child abuse
- online safety,
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- special educational needs and disability
- supporting pupils in school with medical conditions

- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to children who go missing from education, particularly on repeat occasions.
- safer recruitment

It is the responsibility of the governing body/proprietor to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the pupils who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff (including the headteacher, supply teachers, contractors, and volunteer helpers).

The governing body/proprietor will ensure that there is a named governor for safeguarding, a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for safeguarding and child protection, and a designated teacher to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The governing body/proprietor will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).[4]

The governing body/proprietor will inform Buckinghamshire Council and the BSCP annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

Designated Safeguarding Lead (DSL)
The DSL will take lead responsibility for safeguarding and child protection (including online safety including and understanding the filtering and monitoring systems in place). This will be made explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex C of KCSiE).

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

The DSL and any alternate DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

During term time, the DSL and/or an alternate should always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

[4] Set out in paragraphs 85-93 of KCSiE

The DSL will undergo training to provide them with the knowledge and skills to carry out the role and is expected to update their knowledge and skills at regular intervals to allow them to keep up with developments relevant to their role.

The DSL will liaise with the headteacher to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.[5]

Headteacher

The headteacher will ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

All staff

All staff have a responsibility to provide a safe environment in which children can learn.

All staff must read and ensure they understand at least Part One and Part Five of KCSiE.

All staff must ensure they are familiar with the systems within school which support safeguarding, including the child protection and safeguarding policy, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

All staff should be aware of indicators of abuse, neglect and exploitation and so that they are able to identify cases of children who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should know what to do if a child tells them he/she is being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity, such as knife crime, or involved in county lines drug dealing.

All staff should be aware of the process for community-based Family Help assessments:

- the criteria, including the level of need, for when a case should be referred to Family Help support and services, provided at:

[5] See LA explanatory note on the requirements around children having an appropriate adult Schools-StopSearch-v2.3.pdf (squarespace.com)

- Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
- Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)
- the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
- Section 31 of the Children Act 1989 (care and supervision orders), and
- Section 20 of the Children Act 1989 (duty to accommodate a child)
- and clear procedures and processes for cases relating to:
- the abuse, neglect, and exploitation of children
- children managed within the youth secure estate
- disabled children

All staff should be aware of, and understand their role within the Early Help services, at school/college and local authority level Early Help - Buckinghamshire Safeguarding Children Partnership. This includes providing support as soon as a problem emerges, via universal services and community-based early help. The DSL will when necessary, refer via the MASH for the targeted early help level of Family Help. The DSL will share information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs (see Section 12: Information Sharing). In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (SEN) (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or forced marriage.
- is a privately fostered child

Knowing what to look out for is vital to the early identification of abuse, neglect and exploitation and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Details of the school's safeguarding team are on the front of this policy.

Professional Curiosity, Respectful Challenge and Escalation

All staff and volunteers must maintain professional curiosity when working with children, families and other professionals, seeking to understand the lived experience of the child and not accepting information at face value where safeguarding concerns may exist. Staff are expected to ask questions, explore inconsistencies, consider alternative explanations, and remain alert to signs of harm, neglect, exploitation or disguised compliance. Where there are differences of professional opinion, concerns about the quality of decision-making, or a belief that a child is not receiving an appropriate safeguarding response, staff must provide respectful professional challenge and seek timely resolution in the best interests of the child. If concerns remain unresolved, staff must follow the school's safeguarding escalation procedures and relevant multi-agency dispute resolution processes. A culture of constructive challenge, professional accountability and evidence-informed decision-making is essential to safeguarding and promoting the welfare of children. This approach reflects the expectations set out in *Working Together to Safeguard Children 2026*, which emphasises professional curiosity, mutual challenge and effective escalation as key features of strong safeguarding practice.

5. Induction & Training

The governing body/proprietor will ensure that all staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with advice from the BCSP. In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-level concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE will be provided to new staff at induction.

The governing body/proprietor will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the governing body/proprietor will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.

6. Recognising concerns - signs and indicators of abuse.

All staff should be aware of indicators of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

All staff should be aware that abuse, neglect 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.

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Risks to children include sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL.

Indicators of abuse and neglect

Abuse is defined as 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. They may be abused by an adult or adults or another child or children.

The following indicators listed under the categories of abuse are not an exhaustive list:

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children 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 violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult

males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

(Source Keeping Children Safe in Education)

7. Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm and those safeguarding issues often overlap.

Behaviours linked to issues such as of drug taking and/or alcohol abuse, unexplainable and or/persistent absences from education, serious violence (including that linked to county lines) and consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. Other safeguarding issues all staff should be aware of include:

Child-on-child abuse
All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand that even if there are no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy). Parents/Carers and Students can report concerns in person to any member of staff, on email to safeguarding@rgshw.com, students can also report via Tootoot. It is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) and record these using the school's CPOMS system.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case

scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- 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 stand-alone 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 self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence. Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK
- 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)

All staff should be clear about the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Early help

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help.

Community-based Early Help assessment.

If children do not require the support of statutory children's services, the designated safeguarding lead (or a deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children. Any such cases should be kept under constant review and consideration given to a referral to local authority children's

social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including Section 17.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, (particularly older children), and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is 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". Links to the Home Office's County Lines advice is provided within the serious violence information on page 166. also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the

internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Working to prevent Child Sexual Exploitation

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. 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). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM)

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers[6]. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.
These could include:

[6] Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

significant changes in behaviour
ongoing difficulty sleeping
withdrawing from social situations
not wanting to do things they usually like, and
physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, education staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or take them to A&E immediately. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Our school's local arrangements for supporting children's mental health include:

- **Pastoral Team**: Dedicated pastoral staff in the form of Heads of Year, The Pastoral Support Officer and the School SENDCO are available to provide immediate support to students experiencing mental health difficulties. They are the first point of contact for concerns and work closely with the DSL to monitor student wellbeing.
- **Counselling Services**: We provide access to in-school counselling services for students who require therapeutic support. Referrals are managed through the pastoral team in collaboration with the DSL.
- **External Referrals**: When necessary, the school facilitates referrals to external mental health services, such as CAMHS or local community support providers, ensuring timely access to specialist care.
- **Identification and Support**: We maintain a robust system for identifying students who may be struggling with their mental health, with regular check-ins and tailored support plans for those identified as at risk.
- **Staff Training**: All staff receive regular training on recognising the warning signs of mental health issues and understanding how to refer concerns to the pastoral team and the DSL.

Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school). Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge is vital. This includes access to trusted

adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

Preventing Radicalisation and Extremism (The Prevent Duty)

The Prevent Duty protects children, young people and adults from the risk of radicalisation, a process where a person becomes vulnerable to extremist influences or drawn into supporting terrorist ideologies. The school recognises its statutory responsibilities under Section 26 of the Counter-Terrorism and Security Act 2015 and is fully committed to fulfilling the Prevent Duty as part of its wider safeguarding responsibilities. The school will take proportionate and age-appropriate steps to identify, assess and respond to concerns that a pupil may be vulnerable to extremist ideologies or influences. Staff are expected to remain vigilant to indicators of radicalisation, promote fundamental British values, encourage critical thinking, and create an inclusive environment in which respectful debate can take place and extremist narratives are challenged. All staff will receive appropriate Prevent training to enable them to recognise potential signs of radicalisation and understand referral pathways. Where concerns arise, these will be acted upon in accordance with safeguarding procedures, including consultation with the Designated Safeguarding Lead (DSL) and, where appropriate, referral to external agencies, including Channel. The school will work in partnership with families, local authorities, safeguarding partners, police and other relevant agencies to ensure that children who may be susceptible to radicalisation receive timely support and protection, recognising that vulnerability to extremist influence should be addressed through the same child-centred safeguarding principles that apply to all forms of harm.

8. Children potentially at greater risk of harm

The governing body/proprietor recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them.

Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their 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.

The management committee/proprietor will have regard to the following statutory guidance:

Alternative provision – DfE Statutory Guidance, and
Education for children with health needs who cannot attend school – DfE Statutory Guidance

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to complex safeguarding or welfare needs. Children may need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The governing body/proprietor expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and the school to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils, and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- The department's statutory guidance on school attendance Working together to improve school attendance https://www.gov.uk/government/publications/working-together-to-improve-school-attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties for CME, which can be found in the department's statutory guidance: Children Missing Education. https://www.gov.uk/government/publications/children-missing-education This includes information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, along with

how schools should be supporting local authorities with joint reasonable enquiries to help identify and support children missing in education.

- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges. https://www.gov.uk/guidance/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy. https://www.gov.uk/government/publications/missing-children-and-adults-strategy

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

It is important that the school's procedures for unauthorised absence and for dealing with children who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to LA children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's unauthorised absence procedures and children who are absent from education procedures. This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

School Procedures for Unauthorised Absence and Missing Children
The Royal Grammar School closely monitors attendance to identify potential safeguarding concerns early. Our procedures include:

- **First-Day Contact:** If a student is absent without an explanation, the Attendance Officer will contact the parents/carers on the first morning of the absence.

- **Vulnerable Children:** For students known to be vulnerable (e.g., those with a Child in Need or Child Protection plan, or Looked After Children), the DSL or a member of the Pastoral Team will be notified immediately of any unexplained absence. If contact with the family cannot be made, the DSL will coordinate with the allocated Social Worker and consider a home visit or requesting a police welfare check.
- **Escalation:** If a student is absent for a prolonged period, or on repeat occasions without authorization, the Pastoral Team will review the case alongside the DSL to identify potential risks of exploitation, neglect, or harm.
- **Local Authority Notification:** In accordance with statutory requirements, the school will notify Buckinghamshire Council if a student is absent without authorization for 10 consecutive school days. The school will also collaborate with the Local Authority to make joint reasonable enquiries for any Child Missing Education (CME) and will follow statutory procedures before removing a child from the school roll at standard and 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.

Further information and support includes:

- Schools' duties regarding children who are absent from education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: Children who are absent from education.
- General information and advice for schools can be found in the Government's Missing Children and Adults Strategy.
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges
- Statutory guidance for schools concerning children who are absent from education
- https://www.gov.uk/government/publications/working-together-to-improve-school-attendance
- Summary of responsibilities where a mental health issue is affecting attendance

Alternative Provision (AP)

The school recognises that pupils placed in Alternative Provision (AP) remain on the school roll and that the governing body and Headteacher retain overall responsibility for the pupil's education, welfare and safeguarding. In accordance with Section 19 of the Education Act 1996 and relevant Department for Education guidance, the school will ensure that any AP placement is suitable, safe, regularly reviewed and able to meet the pupil's educational, attendance, welfare and safeguarding needs. Prior to commissioning a placement, the school will undertake due diligence to assure itself that the provider has effective safeguarding policies, safer recruitment procedures, health and safety arrangements, staff

training and robust systems for reporting concerns. The school will maintain active oversight of all pupils attending AP through regular review meetings, ongoing communication with providers, attendance monitoring, progress tracking and welfare checks. Daily or weekly attendance information will be obtained and scrutinised, and AP pupils will be considered within safeguarding and vulnerable pupil discussions where appropriate. Any concerns regarding attendance, missing education, exploitation, mental health, behaviour, welfare or the suitability of the placement will be acted upon promptly through the school's safeguarding procedures. The school will routinely evaluate the effectiveness of AP placements, challenge any concerns regarding provision quality or safeguarding practice, and work with parents, carers, local authorities and partner agencies to ensure that placements continue to meet the needs of the child and achieve positive outcomes.

Attendance as a Safeguarding Priority

The school recognises that attendance is a key safeguarding indicator and that frequent, prolonged or unexplained absence may be a sign of abuse, neglect, exploitation, poor mental health, family difficulties or other welfare concerns. Attendance is therefore monitored as an integral part of the school's safeguarding arrangements rather than solely as an educational measure. Attendance data is reviewed routinely by school leaders, attendance staff and safeguarding personnel to identify emerging concerns, patterns and trends. Particular attention is given to pupils who are persistently absent (attendance below 90%) and severely absent (attendance below 50%), as these thresholds may indicate increased vulnerability and a need for additional support or intervention. Attendance information is considered alongside safeguarding records, behavioural concerns, welfare information and other indicators of vulnerability to ensure that risks are identified at the earliest opportunity. The school will investigate unexplained absence, repeated patterns of absence, children missing education, part-time or reduced timetables and any failure to return to school following a period of absence. Attendance concerns may result in pastoral support, attendance action plans, home visits, early help assessments, multi-agency working or safeguarding referrals where appropriate. Children with persistent or severe absence will be subject to enhanced monitoring and regular review to ensure barriers to attendance are understood and addressed. The school will work proactively with parents, carers, the local authority and partner agencies to secure improved attendance while maintaining a child-centred approach. Where attendance concerns suggest that a child may be suffering or at risk of harm, safeguarding procedures will take precedence and appropriate referrals will be made without delay.

Elective home education (EHE)

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that

some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs. In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, https://www.legislation.gov.uk/uksi/2024/208/made a school must make a return to the local authority when a pupil's name is deleted from the admission register. Where a parent/carer has expressed an intention to remove a child from school to educate them at home, schools and local authorities should, where appropriate and proportionate, seek opportunities to discuss the decision with parents/carers before arrangements are finalised. The aim is to ensure parents/carers are aware of the implications of elective home education and have considered what is in the best interests of their child. This may be particularly important where a child has special educational needs or disabilities, has a social worker, or is otherwise vulnerable. DfE guidance for local authorities on Elective Home Education https://www.gov.uk/government/publications/elective-home-education sets out the role and responsibilities of local authorities and their powers to engage with parents. Although this is primarily aimed at local authorities, schools should also be familiar with this guidance.

Children requiring mental health support

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.

The governing body/proprietor will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system.

Procedures for Identifying and Escalating Mental Health Concerns
Staff are well-placed to observe day-to-day changes in a child's behaviour that may indicate they are experiencing a mental health problem or are at risk of developing one.

Identification:

- Staff must remain vigilant for warning signs, which may include significant changes in behaviour, withdrawal from social situations, visible signs of self-harm, extreme fatigue, or sudden drops in academic performance.
- Students are encouraged to self-report or report concerns about their peers to any trusted adult or digitally via the **Tootoot** platform.

Recording and Initial Action:

- All observed concerns regarding a student's mental health must be recorded factually and promptly on **CPOMS**.
- If a staff member is unsure if a behaviour constitutes a safeguarding concern, they must err on the side of caution and consult the DSL or Senior Mental Health Lead (Mr Durning).

Escalation Routes:

- **Pastoral Triage:** The Heads of Year, Pastoral Support Officer, and SENCO review CPOMS logs daily. Lower-level concerns will trigger pastoral interventions, such as mentoring, check-ins, or communication with parents/carers.
- **Internal Support:** Where appropriate, the Pastoral Team or DSL will refer the student to our in-school counselling services for targeted therapeutic support.
- **External Referral (Early Help / Statutory):** If the student's needs exceed the school's internal capacity, or if their mental health decline indicates they are at risk of significant harm, the DSL will escalate the concern. This may involve referrals to CAMHS (Child and Adolescent Mental Health Services), early help services via the Buckinghamshire MASH, or other community-based support providers.
- **Immediate Danger:** If a student expresses active suicidal ideation, makes plans to end their life, or requires urgent medical attention due to self-harm, staff must **not** leave the child alone. They must contact the DSL immediately. If there is an imminent risk to life, staff must dial 999 or ensure the student is taken safely to A&E.

Staff can access further advice in a DfE guidance documents Preventing and tackling bullying and mental health and behaviour in schools which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of pupils.

The school's senior mental health lead is Mr Durning who is a member of the senior leadership team.

Looked after children and previously looked after children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The governing body/proprietor will ensure staff have the skills, knowledge and understanding to keep looked after children safe.

The governing body/proprietor will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The governing body/proprietor recognises that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

For children who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

Children with SEN and disabilities, or health issues can face additional safeguarding challenges, both online and offline.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Staff should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Staff also need to be mindful of children's cognitive understanding, for example, whether they are able to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in school.

As such, any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

Further information can be found in the DfE's:
SEND Code of Practice 0 to 25 years, and from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support
- Services (SENDIASS). SENDIASS offer information, advice and support for
- parents and carers of children and young people with SEND. All local
- authorities have such a service: Find your local IAS service
- (councilfordisabledchildren.org.uk)
    - Mencap - Represents people with learning disabilities, with specific advice and
- information for people who work with children and young people
    - NSPCC - Safeguarding children with special educational needs and
- disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and
- disabled children and young people

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

The governing body/proprietor acknowledges a child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

9. Opportunities to teach safeguarding

The governing body/proprietor will ensure that children and young people are taught about how to keep themselves and others safe, including online.

The governing body/proprietor recognises that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

Relevant topics will be included within Relationships Education *(primary schools)* and Relationships and Sex Education (also known as Sex and Relationship Education) *(secondary schools)* and through Health Education *(all pupils in state funded schools)*, having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. *4

*4 Relationships Education, Relationships and Sex Education and Health Education guidance

The governing body/proprietor expect that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetables lessons and reinforced throughout the whole curriculum. This whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

10. Online safety and filtering and monitoring

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

The governing body/proprietor has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

Online safety issues can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation, extremism, misinformation, disinformation (including fake
- news) and conspiracy theories.
- Contact: being exposed to harmful online interaction with other users, 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 (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying, and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group (https://apwg.org/).

The governing body/proprietor will ensure that an annual review is undertaken of the school's approach to online safety including the school's filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks pupils face online. Schools can use the department's 'plan technology for your school service to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

The review should include a member of the senior leadership team, the DSL, the IT service provider and a governor. To keep students safe, the school uses Fortinet for filtering and SENSO for monitoring. These systems are reviewed annually to ensure they remain effective. We take active measures against cyber attacks, including maintaining robust security protection procedures and periodically reviewing their effectiveness to keep pace with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at Cyber security training for school staff - NCSC.GOV.UK. In addition, schools and colleges should consider taking appropriate action to meet the Cyber security standards for schools and colleges which were developed to help them improve

their resilience against cyber-attacks.
Meeting digital and technology standards in schools and colleges

The school's online safety policy outlines the appropriate filtering and monitoring which take place on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation filtering and monitoring.

The school recognises that generative AI tools, such as Microsoft Copilot and ChatGPT, may support teaching, learning and administrative activities when used appropriately. Any use of AI must be safe, ethical, lawful and consistent with the school's safeguarding, data protection, acceptable use and assessment policies. Staff and pupils must not enter personal, confidential or sensitive information into AI tools and should critically evaluate AI-generated content, as it may be inaccurate, biased or incomplete. AI should be used to support, rather than replace, professional judgement, learning, creativity and independent thinking. The school will promote responsible AI use and ensure that any use of AI complies with Department for Education guidance and relevant statutory requirements. *5

School staff can access resources, information and support as set out in Annex B of KCSiE.

From 1st September Government guidance prohibits the use of mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime. Mobile phones in schools - GOV.UK

Students in Years 7-11 are prohibited from having mobile phones, smartwatches, smartglasses, or headphones in their possession as soon as they enter the school gates after 8am and during the school day; all such devices must be switched off and stored in bags or lockers. The Sixth Form policy enforces this ban with specific exceptions for the Sixth Form Centre. We actively promote face-to-face socialisation during school trips to reduce screen time. For full details, please refer to the school's Mobile Phone Policy.

*5 artificial-intelligence-in-education

11. Procedures

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns on the school's safeguarding management system or on a school recording form for safeguarding concerns and pass it to the DSL without delay and record on CPOMS.

What to do if you are concerned.
If a child makes an allegation or disclosure of abuse against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully
- Accept what is being said
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth
- Only ask questions when necessary to clarify, do not investigate or ask leading questions, if required use TED questions (Tell Explain Describe)

- Reassure the child, but don't make promises which it might not be possible to keep
- Do not promise confidentiality
- Emphasise that it was the right thing to tell someone
- Reassure them that what has happened is not their fault
- Do not criticise the perpetrator
- Explain what must be done next and who has to be told
- Make a written/online record, which should be signed and include the time, date and your position in school
- Do not include your opinion without stating it is your opinion
- Pass the information to the DSL or deputy DSL without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

When a record of a safeguarding concern is passed to the DSL, the DSL will assess the concern and, taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a child in need. If the DSL is unsure whether the threshold has been met, they will contact the MASH for advice and guidance.

Where a safeguarding concern does not meet the threshold for completion of a MASH Referral, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help including the school or college's local early help offer.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with BSCP procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each pupil.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education. Refer a child missing education | Buckinghamshire Council

All staff at the Royal Grammar School operate a zero-tolerance policy to child-on-child abuse, including sexual violence and sexual harassment, and will not pass off incidents as 'banter' or 'just growing up'. All victims will be reassured that they are being taken seriously, supported, and kept safe; no child will ever be made to feel ashamed for making a report.

Incidents of child-on-child abuse must be reported to the DSL, who will refer to the appropriate agencies as required. For comprehensive details on how these concerns are managed, risk-assessed, and escalated, staff must cross-reference the school's standalone ***Child on Child Abuse Policy****, as well as the* ***Behaviour Policy*** *and* ***Anti-Bullying Policy****.*

12. Information sharing, record keeping and confidentiality

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff will have regard to the Government guidance: Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and UK Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

DSLs must keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or alternate DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so.
A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils) or promise a child to keep a secret which might compromise the child's safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the UK GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetuated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm threshold is met.

Ordinarily, the school will always undertake to share its intention and seek informed consent to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

The General Data Protection Regulation and the Data Protection Act 2018 states that, the school has the authority to share information with the Local Authority “in the exercise of our official duties without seeking consent”.
The “**public task basis**” as described in the legislation allows authorities to use data when they can demonstrate that the processing is to perform tasks that are set by national law. This means parental consent is not necessary for the obtaining and sharing of information "Between agencies when that information is for child protection or safeguarding purposes or for an assessment of a child or children’s needs.
“Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.” GDPR Article 6

The school will have regard to the KCSiE Guidance on the Transfer of a Child Protection /or Safeguarding File to another Education Setting. Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Further details on information sharing can be found:

- in Working Together to Safeguard Children, which includes a myth-busting guide to information sharing.
- at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, the seven golden rules for sharing information will be especially useful.
- the Information Commissioner’s Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK which is intended to help practitioners to feel confident to share personal information for safeguarding purposes.
- in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

13. Managing allegations made against teachers, including supply teachers, trainee teachers, other staff, volunteers and contractors

The school will follow the BSCP LADO - Buckinghamshire Safeguarding Children Partnership if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

- behaved in a way that has harmed a child, or may have harmed a child;

- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child the member of staff, supply teacher, trainee teachers, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

Concerns that do not meet the harm threshold will be dealt with in accordance with the school's policy for managing low-level concerns. At The Royal Grammar School, all staff have a responsibility to share any concerns, no matter how small, about any adults working in the school with the Headteacher, DSL, or a Deputy Head. All reports will be dealt with effectively and recorded in writing, enabling the school to identify any concerning behaviour and support any adults becoming the subject of false low-level concerns.

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns and will determine any further action in line with the **Staff Code of Conduct**. For full details and procedures, please refer to the school's **Low-Level Concerns Policy**, which can be found in **Appendix C** of this policy.

If any member of staff has concerns that a colleague, cover teacher, trainee teacher, volunteer or contractor might pose a risk to children, it is their duty to report these to the headteacher. Where there is a concern/allegation about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school. In the event of a concern/allegation about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) LADO(s).

Low-Level Concerns About Adults Working with Children

The school is committed to fostering a strong culture of safeguarding in which all concerns about the conduct, behaviour or actions of adults working with children are recognised, reported and addressed appropriately. A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is inconsistent with the staff code of conduct, professional standards, or expected safeguarding practices, even if it does not meet the harm threshold. All staff are encouraged, and expected, to share low-level concerns promptly with the Headteacher or appropriate safeguarding lead to ensure that situations are assessed, recorded and managed consistently. The school recognises that effective management of low-level concerns helps to identify patterns of behaviour, promotes professional accountability, reinforces appropriate boundaries, protects children from potential harm, and safeguards staff from misunderstandings or unfounded

allegations. Concerns will be handled fairly, proportionately and sensitively, with clear regard for confidentiality and natural justice. By maintaining an open and transparent reporting culture, the school aims to minimise the risk of abuse, strengthen safeguarding practice, and ensure that the welfare of children remains paramount at all times.

14. Use of school premises for non-school activities

The governing body/proprietor will ensure that where school facilities/premises are hired or rented out to organisations or individuals, sports associations or service providers to run community or extra-curricular activities appropriate arrangements are in place to keep children safe.

The governing body/proprietor will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the school facilities or premises to liaise with the school on these matters where appropriate.

These arrangements will apply regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Where a lease or hire agreement is entered into the governing body/proprietor will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

15. Whistleblowing

The governing body/proprietor recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example, pupils in the school or members of the public.

The governing body/proprietor would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within school, including the whistleblowing procedure adopted by governors/proprietor where necessary (5.4 Whistleblowing – Buckinghamshire SCP MAPP Resource). However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: help@nspcc.org.uk

16. Useful Contacts:

Buckinghamshire Children's Social Care & Multi-agency Safeguarding Hub (MASH)	For **urgent safeguarding concerns** the quickest way to let our MASH Team know is by calling them on: 01296 383 962 between 9am to 5:30pm Monday to Thursday, 9am to 5pm Friday. 0800 999 7677 before 9am, after 5:30pm (5pm on a Friday) or at weekends (Emergency Duty Team).
Police	**101 or for emergency: 999**
FGM - Mandatory reporting	**Police on 101**
Local Authority Designated Officer for Allegations against staff (LADO)	**secure-lado@buckinghamshire.gov.uk** **Telephone: 01296 382070**
Children and Young People with Disabilities 0-25 years	**Children with Disabilities Team (Buckinghamshire Council)** • **Phone:** 01296 383762
Local multi-agency procedures, guidance and Training: Buckinghamshire Safeguarding Children Partnership	Home - Buckinghamshire Safeguarding Children Partnership
NSPCC	**0800 800 5000**
Report Abuse in Education NSPCC Helpline	**0800 136 663**
Childline	**0800 1111**
Government's Whistle-blowing Service via NSPCC Report Line	**0800 028 0285**
Forced Marriage Unit	**Tel: 020 7008 0151** From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm) Out of hours: 020 7008 1500 (ask for Global Response Centre) Email: fmu@fco.gov.uk

Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)	**Tel: 020 7340 7264** Email: counterextremism@education.gsi.gov.uk
Disclosure and Barring Service	**Tel: 03000 200 190** Email: customerservices@dbs.gov.uk
Teaching Regulation Authority	**Tel: 020 7593 5392** Email: misconduct.teacher@education.gov.uk

17. Appendix A – Taking a Disclosure and Recording Safeguarding Concerns

1. How to Respond to a Disclosure

If a child makes an allegation or disclosure of abuse against an adult or other child, or you notice signs of harm, it is vital that you respond appropriately. All staff must adhere to the following steps:

- **Listen carefully:** Allow the child to tell you what has happened in their own way and at their own pace. Do not interrupt a child who is freely recalling significant events.
- **Stay calm:** Be reassuring and supportive, endeavouring not to respond emotionally.
- **Do not ask leading questions:** Only ask questions when necessary to clarify. Use TED questions (Tell, Explain, Describe).
- **Use their exact words:** Do not substitute anatomically correct names for body part names used by the child.
- **Reassure the child:** Emphasise that they did the right thing in telling someone.
- **Do not promise confidentiality:** Explain to the child what will happen next and the need for the information to be shared with the DSL.
- **Act immediately:** If there is an immediate risk of harm to a child, do not delay and ring 999. Otherwise, the child should be monitored/accompanied until a plan is agreed upon, and the information must be passed to the DSL (or Deputy) without delay.

2. Recording Concerns (Staff)

- All staff must make an accurate written record of what they have seen or heard using **CPOMS**.
- Log in to CPOMS at **https://rgshw.cpoms.net**.
- Ensure your record is factual and includes who was involved, what was said/seen/heard, where the incident took place, times, dates, and any actual words or phrases used by the child.
- (Note: For staff using CPOMS for the first time, guidance can be found in the Safeguarding area on Google Drive).

3. Recording Concerns (Volunteers, Visitors, and Supply Staff)

- Individuals without an active CPOMS account must report concerns using the **pink RGS Child Protection/Welfare Concern Forms**.
- These forms are readily available in Reception, the staff rooms, and from the Assistant Head Office.
- Completed forms must be signed, dated, and handed directly to the DSL (Mr D P Durning) or a Deputy DSL immediately. Do not leave safeguarding forms unattended on desks.

18. Appendix B – Body Maps

At the Royal Grammar School, the recording of physical injuries is integrated into our digital and physical reporting structures:

- **For Staff (CPOMS):** There is no need to complete a separate physical body map. Staff recording concerns via CPOMS must utilise the built-in digital body map feature within the system to accurately log any visible injuries or marks reported by the child.
- **For Volunteers/Visitors (Pink Forms):** For those without CPOMS access, a physical body map is included as part of the pink RGS Child Protection/Welfare Concern Form. Please mark this factually at the time of observation.

(Important: Staff must only record injuries that are visible or that the child freely shows/describes. Never ask a child to remove clothing to inspect an injury).

19. Appendix C (Part 1) - Allegations against Staff

Section 1: allegations that may meet the harms threshold

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 our local authority designated officer (LADO).

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

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

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

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

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. Individual will also be supported by Senior Team, HR and trade union representative of their union.
- 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

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 7.7 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
- Ensuring that adults consistently model the school's values to help keep children safe.
- 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 code of conduct for staff. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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 C (Part 2) – Low-Level Concerns Policy

1. Purpose

This policy aims to create a culture of openness and trust where staff feel comfortable sharing concerns about their own or colleagues' behaviour. It is designed to identify patterns of behaviour early, protect children from potential harm, and safeguard staff from misunderstandings or unfounded allegations.

2. Definition

A "low-level concern" is any concern—no matter how small—that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct.
- Suggests an adult has acted in a way that is inappropriate or may have misunderstood the professional boundary.
- Does *not* meet the "harm threshold" (which would be handled under formal allegations procedures).

3. Reporting Procedures

- **Expectation:** All staff have a responsibility to share low-level concerns about any adult working in the school (including staff, volunteers, contractors, and supply teachers).
- **Mechanism:** Concerns must be reported promptly to the Headteacher (or the Chair of Governors if the concern is about the Headteacher).
- **Format:** Reports should be made in writing, detailing the context, the behaviour observed, and any relevant background. These should be dated and signed by the reporting staff member.

4. Management of Concerns

- **Recording:** All low-level concerns will be recorded in a central, secure file, separate from personnel files. This record will be kept confidential, with access restricted to the Headteacher/DSL.
- **Evaluation:** The Headteacher will review the concern to determine if it is truly a "low-level" concern, if any training or support is required, or if the behaviour indicates a pattern that requires further investigation.
- **Escalation:** If, upon review, it is discovered that the concern meets the "harm threshold," the school will immediately pivot to formal allegations procedures and contact the LADO (Local Authority Designated Officer).

5. Culture and Confidentiality

- The school is committed to a culture of constructive challenge. Reporting a low-level concern is not a criticism of the individual, but a safeguard for the entire community.
- Confidentiality will be maintained regarding the identity of the person raising the concern, as far as possible, and the subject of the concern, in line with data protection laws and the principles of natural justice.

20. Appendix D – Linked School Policies and Procedures

Safeguarding is a whole-school responsibility that intersects with numerous other operational areas. This Safeguarding & Child Protection Policy should be read and understood in conjunction with the following school policies and statutory guidance documents, which are available on the school website and the staff shared drive:

- Staff Code of Conduct / Staff Behaviour Policy
- Child-on-Child Abuse Policy
- Low-Level Concerns Policy
- Behaviour Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- Online Safety Policy (including Acceptable Use of ICT)
- Mobile Phone Policy (including Sixth Form specific guidance)
- Whistleblowing Policy
- Attendance Policy
- Special Educational Needs and Disability (SEND) Policy
- Supporting Pupils with Medical Conditions Policy
- Data Protection and UK GDPR Policy.