

Child Protection and Safeguarding Policy

Reviewed by: Trustees' Community and Wellbeing committee

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1.0 Introduction

- 1.1 Katharine Lady Berkeley's School (the "School") recognises the importance of creating an ethos within school that will help children to feel safe and confident and that they will be listened to. The School recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The School is committed to providing a safe environment for pupils where safeguarding and child protection are at the forefront and underpin processes. The School recognises its statutory responsibilities to safeguard and promote the welfare of children.
- 1.2 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and will be referred, where appropriate, by the Designated Safeguarding Lead to the Local Authority Designated Officer (LADO), children's social care services and/or the police.
- 1.3 This policy is provided to all members of staff and volunteers on induction, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is outside the School.
- 1.4 The School is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. The School will follow the procedures set out by Gloucestershire Safeguarding Children's Partnership and guidance issued by the Department for Education.
- 1.5 Parents are encouraged to raise any safeguarding concerns directly with the School.

2.0 Definitions

- 2.1 Safeguarding means providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, preventing impairment of their physical and mental health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes. (KCSIE 2025, Part 1 and Working Together 2023)

2.2 Child protection is part of safeguarding. It refers to the processes undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. This includes responding to concerns, making referrals, and working with other agencies to safeguard children.

2.3 Abuse is a form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include physical, emotional, and sexual abuse, and neglect. It also includes ill-treatment that is not physical and the impact of witnessing the ill-treatment of others, such as exposure to domestic abuse. Abuse may occur in person or online and can be perpetrated by adults or by other children.

2.4 Early help means providing support as soon as a problem emerges, at any point in a child's life. Effective early help relies on early identification, information sharing, and joint working between agencies to prevent issues from escalating. Schools have an important role in identifying children who may benefit from early help and in supporting coordinated intervention.

2.5 Staff includes all employees, trustees, supply staff, contractors, and volunteers — anyone working for, or on behalf of, the school, whether in regulated or non-regulated activity.

3.0 Board of Trustees

3.1 The Board of Trustees has appointed a trustee, Simon Weston, to take leadership responsibility for safeguarding arrangements.

3.2 The Board of Trustees will:

3.2.1 have regard to guidance published by the Department for Education, including:

3.2.1.1 Keeping Children Safe in Education 2025;

3.2.1.2 Working Together to Safeguard Children 2023

3.2.1.3 Filtering and monitoring standards for schools and colleges 2022 (updated March 2025)

3.2.1.4 Cyber Security Standards for Schools and Colleges (2025)

3.2.1.5 Prevent Duty Guidance: for England and Wales (2023);

3.2.1.6 Gender Questioning Children Guidance (2024) Behaviour in Schools Guidance (2024)

3.2.1.7 Suspension and Permanent Exclusion Guidance (2024)

3.2.1.8 After-School Clubs, Community Activities and Tuition safeguarding guidance for providers (September 2023)

- 3.2.1.9 Sharing nudes and semi-nudes: advice for education setting working with children and young people 2020 (updated March 2024); Information Sharing advice for practitioners providing safeguarding services for children, young people, parents and carers 2024;
- 3.2.1.10 Relationships education, relationships and sex education (RSE) and health education (September 2021); and
- 3.2.1.11 Where the School has charitable status, have regard to Charity Commission guidance on charity and trustee duties to safeguard children;
- 3.2.2 follow the local practice guidance of the Gloucestershire Safeguarding Children's Partnership; <https://www.gloucestershire.gov.uk/gscp/>
- 3.2.3 ensure that the school's Single Central Record (SCR) is checked and signed off every full term (autumn, spring and summer) by the appointed Safeguarding Trustee to confirm compliance with statutory safer recruitment requirements.
- 3.2.4 ensure that the school completes the annual Gloucestershire Safeguarding Declaration and implements any resulting action plan
- 3.2.5 establish clear policies on drugs, alcohol and substance misuse;
- 3.2.6 ensure that safeguarding training for staff, including online safety training (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), and safeguarding teaching for children, including online safety, is integrated, aligned and considered as part of the whole School safeguarding approach and wider staff training and curriculum planning having regard to the Teachers' Standards guidance;
- 3.2.7 Have overall strategic responsibility for filtering and monitoring, ensuring compliance with the DfE Filtering and Monitoring Standards (2025), and record this oversight in the trustee body minutes.
- 3.2.8 establish robust health and safety and emergency evacuation procedures;
- 3.2.9 ensure that appropriate arrangements are in place to keep children safe where School facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate Disclosure and Barring Service (DBS) checks;

- 3.2.10 ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement;
- 3.2.11 ensure that all trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be updated annually;
- 3.2.12 be aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements.
- 3.2.13 The School is committed to anti-discriminatory practice and recognises that some children face additional barriers to recognition and disclosure. Special consideration is given to children who: have SEND or health conditions; are looked-after or previously looked-after; have a social worker; are young carers; have English as an additional language (EAL); may experience discrimination (for example due to race, ethnicity, religion, sex, sexual orientation or gender identity); are asylum seekers or refugees; are persistently absent from education; or are at risk of female genital mutilation (FGM), forced marriage, child criminal or sexual exploitation (CCE/CSE), radicalisation, or serious violence.
- 3.2.14 Staff provide safe spaces for pupils who are LGBTQ+ or perceived to be LGBTQ+.
- 3.2.15 Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention.

4.0 Head teacher

4.1 The Head teacher will take reasonable measures to:

- 4.1.1 protect each pupil from any form of abuse, whether from an adult or another pupil;
- 4.1.2 be alert to signs of abuse, neglect and exploitation both within and outside the School, and ensure that every suspicion or complaint is dealt with appropriately;

- 4.1.3 support children who have been abused, neglected or exploited;
- 4.1.4 ensure that we practise safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education 2025 and the Education (Independent School Standards) (England) Regulations 2014 as amended;
- 4.1.5 ensure that we carry out all necessary checks on the suitability of people who serve as members and/or on the School's Board of Trustees;
- 4.1.6 ensure that all staff who work directly with children read and understand KCSIE 2025 Part 1 (and Annex B where required), and that those who do not work directly with children read at least Annex A. All staff will sign an annual declaration confirming this;
- 4.1.7 ensure staff know the school's safeguarding systems, including this policy, the staff code of conduct, the behaviour policy, online safety (including roles and responsibilities for filtering and monitoring), and the school's response to children who are absent from education;
- 4.1.8 ensure that all staff receive induction and annual safeguarding updates (including online safety, filtering and monitoring, and Prevent);
- 4.1.9 ensure that all staff complete Prevent awareness training at induction and receive refresher training at least every two years, with annual safeguarding updates including Prevent awareness and local referral processes;
- 4.1.10 ensure that all staff receive training on AI and digital safeguarding as part of annual updates;
- 4.1.11 ensure that staff understand the early help process, maintain professional curiosity, record concerns without delay, and act immediately by speaking with the DSL or a deputy;
- 4.1.12 lead the annual filtering-and-monitoring risk assessment and ensure that appropriate systems are implemented, reviewed and reported to trustees;
- 4.1.13 ensure the following training standards are met:
 - 4.1.14 All staff: induction and annual safeguarding update (including online safety, filtering/monitoring, Prevent);
 - 4.1.15 DSL/DDSL: Level 3; refresh knowledge at least annually; advanced Prevent; filtering/monitoring analysis;
 - 4.1.16 Trustees: safeguarding and online safety training at induction and annually thereafter;

- 4.1.17 Volunteers/contractors: proportionate training commensurate with role;
- 4.1.18 ensure that where the School ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month;
- 4.1.19 ensure that staff follow and implement the Safeguarding and other policies adopted by the Board of Trustees, particularly those concerning referrals of cases of suspected abuse, neglect, and exploitation, which should be transparent, clear and easy to understand for staff, pupils, parents and carers;
- 4.1.20 appoint a Designated Teacher to promote the educational achievement and welfare of looked-after and previously looked-after children, and ensure that the Designated Teacher works with the Virtual School to monitor PEPs, attendance, progress, and information-sharing;
- 4.1.21 check that appropriate child protection arrangements are in place when pupils attend offsite activities; and
- 4.1.22 ensure that the School premises are fit for purpose and take all practicable steps to ensure that the premises are secure. Visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises.

5.0 Designated Safeguarding Lead (DSL)

- 5.1 The School has appointed a senior member of staff with the necessary status and authority to take lead responsibility for safeguarding and child protection.
- 5.2 This designated person at the School is Fran Bailey who can be contacted at fbailey@klbschool.org.uk. Sarah Hind shind@klbschool.org.uk and Hannah Khan hkhan@klbschool.org.uk are also trained as Designated Safeguarding Leads.
- 5.3 Deputy DSLs are Lesley Ford (lford@klbschool.org.uk), Elaine Emms (eeemms@klbschool.org.uk), and Faye Vlietstra (fvlietstra@klbschool.org.uk).
- 5.4 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher or the Head teacher who will notify the Designated Safeguarding Lead in accordance with these procedures.
- 5.5 The main responsibilities of the Designated Safeguarding Lead are:
 - 5.5.1 to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection;

- 5.5.2 co-ordinate the school's safeguarding and child protection procedures and ensure that these are understood and followed by all staff and volunteers;
 - 5.5.3 lead digital safeguarding, including the annual filtering and monitoring risk assessment, analysis of online/AI-related safeguarding trends, and termly reporting to trustees; ensure they are trained in filtering/monitoring analysis and maintain an online-safety risk log;
 - 5.5.4 Ensure termly formal supervision for themselves and supervision for staff handling complex cases;
 - 5.5.5 quality-assure record-keeping, case chronologies and threshold decisions, ensuring timely, accurate and secure recording of concerns;
 - 5.5.6 to ensure that all staff undergo safeguarding training, including online safety training and understanding the filtering and monitoring systems and processes in place, at induction and to maintain an ongoing annual programme for staff and trustees (temporary staff and volunteers will be made aware of child protection procedures and the requirement to follow them);
 - 5.5.7 maintain accurate records of all safeguarding training undertaken by staff and trustees;
 - 5.5.8 monitor and maintain records for children who are the subject of child protection or child-in-need plans, ensuring these are current, detailed and transferred securely when a pupil moves school; take part in child protection conferences and reviews, ensuring that appropriate reports are provided and actions implemented; liaise with social care, the police, health professionals and other agencies as required, ensuring effective multi-agency working;
 - 5.5.9 ensure that all safeguarding records are kept confidentially and securely in accordance with statutory guidance;
 - 5.5.10 to inform social services in writing when a child who is subject to a child protection plan moves to another school and to inform the new school of the child protection plan; and
- 5.6 The Designated Safeguarding Lead for the School will:
- 5.6.1 advise and act upon all suspicion, belief and evidence of abuse reported to them, and refer cases of suspected abuse, neglect or exploitation to the appropriate agencies without delay;
 - 5.6.2 keep the Head teacher informed of all actions unless the Head teacher is the subject of a complaint. In this situation, the Designated Safeguarding Lead should consult with the Chair of the Board of Trustees, without notifying the Head teacher;

- 5.6.3 in conjunction with the Headteacher, complete the Gloucestershire Safeguarding Children Partnership (GSCP) Declaration annually, implement its action plan, and report progress to the Board of Trustees via the Community and Wellbeing Committee; consider the guidance “NSPCC – When to call the police” to understand when to call the police and what to expect when they do; and
- 5.6.4 ensure staff understand and use the school’s filtering and monitoring systems, online-safety procedures, and reporting routes; and
- 5.6.5 ensure familiarity with local specialist support available for children affected by sexual violence, sexual harassment or harmful sexual behaviour, and know how to access this support when required.
- 5.6.6 The designated safeguarding lead should liaise with parents and carers, where appropriate, in order to ensure effective support for the child.”

6.0 Training and Supervision

- 6.1 The DSL and Deputy DSLs will complete Level 3 Safeguarding and Child Protection training, including inter-agency working, and will undertake refresher training at least every two years, with annual knowledge updates (for example via bulletins, briefings, or supervision).
- 6.2 The DSL will receive formal safeguarding supervision at least termly and ensure that appropriate supervision is provided for staff managing complex or high-risk cases.
 - 6.2.1 The DSL will ensure that safeguarding training, filtering-and-monitoring processes, and supervision arrangements are reviewed annually as part of the school’s safeguarding self-evaluation.

7.0 Abuse, neglect and exploitation

- 7.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the emotional 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.

7.2 Abuse may occur in person, online, or through emerging technologies (including AI-generated or digitally manipulated material). Children may be abused in a family, institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or be facilitated by technology. Children may be abused by an adult or adults, or by another child or children.

7.3 No form of abuse should be dismissed as banter or part of growing up.

7.4 Abuse can be:

7.4.1 physical abuse, for example shaking, beating or punching, scalding, drowning or 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;

7.4.2 emotional abuse is 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 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 also involve serious bullying (including cyberbullying), online humiliation, or coercive digital control — including the use of AI or emerging technologies to harass, manipulate, or intimidate, 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;

- 7.4.3 sexual abuse involves forcing or enticing a child or young person to take part in sexual activities whether or not the child is aware of what is happening). It may include physical contact such as sexual assault or acts of penetration or non-contact activities, such as involving children in looking at, or producing, sexual images or pornography, watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. It is not solely perpetrated by adult males; children and women can also commit sexual abuse. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education and all staff should be aware of it and of the School's policy and procedures for responding. Online sexual abuse may include the creation or sharing of AI-generated or digitally manipulated sexual imagery ('deepfakes'). Producing or sharing such images of a child is a criminal offence.
- 7.4.4 Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve failure to provide appropriate care including food, clothing, shelter and/or medical attention. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Online neglect may occur where a child's use of technology is inadequately supervised or leads to exposure to harmful content, exploitation, or unsafe contact.
- 7.4.5 Staff should be aware that abuse is rarely a standalone event that fits neatly into one category. Children may be abused by adults or other children. The School takes a zero-tolerance approach and abuse will never be tolerated or passed off as banter or part of growing up.
- 7.4.6 The School understands that preventative education is most effective in the context of a whole-school approach that promotes respect, equality, and inclusion, and that prepares children for life in modern Britain. This includes fostering a culture of zero-tolerance for sexism, misogyny/misandry, homophobia, biphobic, transphobia and all forms of sexual violence/harassment.
- 7.4.7 Child-on-child abuse may occur in school, outside of school, or online. It can include bullying, physical or sexual violence, coercive control, harassment, image-based abuse, or the creation or sharing of AI-generated or digitally manipulated sexual images ("deepfakes").

- 7.4.8 All incidents or concerns must be recorded, reported and investigated in line with the school's safeguarding procedures. A lack of reports does not mean such abuse is not happening; staff must remain vigilant and report any concerns to the Designated Safeguarding Lead or a Deputy.
- 7.4.9 Child on child abuse may include:
- 7.4.9.1 Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
 - 7.4.9.2 Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
 - 7.4.9.3 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)
 - 7.4.9.4 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)
 - 7.4.9.5 Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - 7.4.9.6 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
 - 7.4.9.7 Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - 7.4.9.8 Upskirting, which is a criminal offence and typically involves taking a picture under a person's clothing without their permission and/or without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - 7.4.9.9 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)
 - 7.4.10 Online child-on-child abuse, which may involve abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

- 7.4.11 AI-related abuse, including the creation or sharing of synthetic or digitally manipulated sexual content (“deepfakes”), coercive digital control, or use of emerging technology to harass or humiliate peers.
- 7.4.12 Staff recognise that some types of abuse may be more prevalent for girls (such as sexual assaults) and other types for boys (such as physical violence). Any abuse by pupils will be subject to disciplinary action under the School’s Behaviour and Discipline policy and through safeguarding procedures
- 7.4.13 Some children may be particularly vulnerable and have an increased risk of abuse. The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges, including difficulties in communication, social isolation or prejudice-based bullying. The School will provide additional pastoral oversight, involve the SENCO or relevant health professionals, and consider early help or other targeted support where appropriate.
- 7.4.14 Children with a social worker: The DSL will ensure that staff know which pupils have a social worker and will work proactively with social care to improve attendance, attainment, and wellbeing. Safeguarding and pastoral responses will reflect these pupils’ vulnerabilities, particularly during attendance, behaviour, and suspension/exclusion processes.
- 7.4.15 Children who are electively home educated (EHE), on reduced timetables, or attending alternative provision, as well as privately fostered children (those staying with non-relatives for 28 days or more), are also recognised as potentially vulnerable groups.
- 7.4.16 Children who are questioning their gender identity will be supported in line with DfE Guidance (2024) and the school’s safeguarding and equality policies.
- 7.4.17 We believe that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The School will give special consideration to children who have SEND, are vulnerable to being bullied, are looked-after or previously looked-after, or are living in unsupportive or high-risk home situations.
- 7.5 All staff must be clear about the School’s policy and procedures regarding child-on-child abuse, and understand the important role they play in preventing, identifying, and responding to concerns.

8.0 Signs of abuse

8.1 Possible signs of abuse include (but are not limited to):

8.1.1 the pupil says that they have been abused or asks a question which gives rise to that inference;

8.1.2 there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries; the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour;

8.1.3 staff should also consider whether a change in behaviour or presentation may indicate an underlying mental-health concern linked to abuse, neglect, or other safeguarding factors

8.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

8.1.5 the pupil's development is delayed;

8.1.6 the pupil is concerned about changing for PE;

8.1.7 the pupil is displaying sexual knowledge or behaviour beyond that expected for his/her age;

8.1.8 the pupil loses or gains weight;

8.1.9 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed; or

8.1.10 the pupil is reluctant to go home.

8.2 Staff are aware that behaviours linked to pupils who take drugs, abuse alcohol, truant or engage in consensual and non-consensual sharing of nude or semi-nude images and/or videos will put children in danger. If staff are ever unsure they should always speak to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.

- 8.3 All staff should be aware of the range of risk factors which increase the likelihood or involvement in serious violence, such as being male (statistically higher risk but not exclusive to boys), having been frequently absent or permanently excluded from School, being known to social care, having experienced child maltreatment and having been involved in offending, such as theft or robbery. All staff should be aware that safeguarding incidents and/or concerning behaviours may be linked to factors outside the school environment and may also occur between children beyond the school setting. All staff, particularly the DSLs and DDSLs, must consider whether children are at risk of abuse or exploitation in situations outside their families.
- 8.4 Extra-familial harm can take many forms, and children may be vulnerable to multiple types of abuse, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse within intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
- 8.5 Staff should consider alerts from the school's filtering and monitoring systems as potential indicators of harm or emerging risk.
- 8.6 Staff should also consider risks that may arise beyond the home or school, including within online communities and AI-driven platforms.
- 8.7 The school recognises the evolving nature of online and technology-related risks. Staff must remain alert to emerging harms, which may include:
- 8.7.1 AI-generated sexual or violent content
 - 8.7.2 Online coercion and 'sextortion'
 - 8.7.3 Financial grooming or online investment scams
 - 8.7.4 Misinformation and radicalising content
 - 8.7.5 Online impersonation or AI chatbot grooming
- This list is not exhaustive and will evolve as technology and digital behaviour change.
- 8.8 Contextual information relating to these and other risks must always inform referrals, assessments, and support plans.

9.0 Children who are absent from Education

- 9.1 All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs. All staff should be aware that children who are absent or missing from education, particularly repeatedly or for prolonged periods, can be a vital warning sign of abuse, neglect, or exploitation. Staff should follow the School's procedures for identifying and responding to pupils who are absent from education to help prevent the risk of their going missing in future.
- 9.2 The School follows the Local Authority's Children Missing Education (CME) procedures and notifies the LA of any pupil removed from roll or missing for ten consecutive school days without permission.
- 9.3 Where a parent expresses an intention to remove a child from school to electively home educate (EHE), the school will work with the Local Authority and other key professionals to coordinate a meeting with parents or carers before a final decision is made. This meeting will consider whether home education is genuinely in the child's best interests. The DSL will contribute to this process and ensure any safeguarding concerns are shared appropriately with the Local Authority.
- 9.4 Filtering and monitoring alerts, or sudden disengagement from online learning platforms, may also provide early warning of risk or absence patterns linked to harm.
- 9.5 The School will endeavour to hold at least two emergency contact numbers for each pupil where reasonably possible. The School will notify the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days. The School will also notify the local authority when a pupil's name is to be deleted from the admissions register.

10.0 Preventing Radicalisation

- 10.1 The School has a duty to give due regard to the need to prevent people from being drawn in to terrorism or supporting terrorism (Prevent Duty). Staff will assess the risk of any pupils being susceptible to radicalisation. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by HM Government as "Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas."

- 10.2 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 10.3 If a member of staff has a concern about a pupil they should follow the safeguarding procedures set out in this policy, including making a referral to the Designated Safeguarding Lead. The DSL will consider whether a referral to the local authority Prevent team is appropriate and, if so, will support the process of assessment through the Channel programme. Channel is a voluntary, multi-agency programme providing support at an early stage for people vulnerable to being drawn into terrorism.
- 10.4 The School will seek to engage with pupils' parents. Staff will assist and advise parents who raise concerns and point them towards appropriate support mechanisms.
- 10.5 The School will build pupil's resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence or harm others.
- 10.6 The School uses appropriate filtering and monitoring systems to protect pupils from terrorist and extremist material online. The DSL leads the annual filtering and monitoring risk assessment, ensuring it includes Prevent-related online risks, including exposure to extremist or AI-generated material. The school will not permit speakers who may promote extremist views on our premises.
- 10.7 Staff should be alert to potential indicators of radicalisation, including pupils distancing themselves from their cultural or religious heritage, making significant changes to their appearance, expressing intolerant views, or showing fascination with extremist or violent material. Other warning signs may include online isolation, engagement with extremist echo chambers or algorithms, or interaction with AI chatbots promoting extremist ideologies.
- 10.8 Staff should record and share any concerning changes in behaviour, expression, or associations with the DSL without delay. · The DSL will undertake Prevent awareness training, and all staff will receive Prevent training at induction and refreshed at least every two years, with annual safeguarding updates reinforcing local Prevent processes. The School will cooperate with the police and local authority in all Prevent and Channel processes. The DSL will attend multi-agency meetings as required.

10.9 The Department for Education's counter-extremism helpline (020 7340 7264 or counter.extremism@education.gov.uk) is available for staff or trustees to raise concerns relating to extremism. In Gloucestershire, concerns can also be discussed with the Prevent Team via prevent@gloucestershire.pnn.police.uk

11.0 So-called 'honour' based abuse

11.1 So-called 'honour'-based abuse (HBA) is a term used to describe incidents or crimes committed to protect or defend the perceived honour of a family or community. This can include female genital mutilation (FGM), forced marriage, breast ironing, and other controlling or violent practices.

11.2 HBA can affect all genders, though women and girls are more commonly targeted. It often involves collective or family-based coercion and may include physical, emotional, or psychological abuse.

11.3 All forms of honour-based abuse are illegal in the UK and a form of child abuse. Staff must report any concern immediately to the Designated Safeguarding Lead (DSL), who will contact the police and/or social care as appropriate.

11.4 The School promotes mutual respect and tolerance of those with different faiths and beliefs as part of its commitment to fundamental British values.

11.5 There are a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, include taking the girl out of the country for a prolonged period or talk of a 'special procedure' or celebration.

11.6 Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), places a statutory duty upon teachers to report to the police, where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Anyone failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should not be examining pupils.

11.7 Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Teachers should still consider and discuss any such case with the Designated Safeguarding Lead.

11.8 The duty to report FGM to the police does not apply in relation to at risk or suspected cases or in cases where the woman is aged 18 or over. Teachers should follow the safeguarding procedures set out in this policy in those circumstances.

11.9 Forced marriage is a form of honour-based abuse and is illegal in the UK. Staff should be alert to any signs of forced marriage. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). It also includes causing a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. It is not the same as an arranged marriage. Children at risk of forced marriage might have their freedom unreasonably restricted or are being monitored by siblings.

11.10 Staff must report concerns immediately to the DSL. The DSL will contact the police and/or the Forced Marriage Unit (020 7008 0151 or fmu@fcdo.gov.uk) for advice and referral.

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

12.1 Being lesbian, gay, bisexual, or gender questioning is not in itself an inherent risk factor for harm. However, children who are LGBTQ+, or who are perceived to be, may face additional barriers to help or disclosure, and may be targeted by others. All staff should be alert to these risks and act promptly on any concerns. Staff will provide safe spaces for pupils who are LGBTQ+ or perceived to be LGBTQ+. The School promotes a culture of inclusion, respect, and trust, where all pupils feel able to speak openly about their experiences or seek help from trusted adults.

12.2 When supporting a gender questioning child, the School will take a cautious and proportionate approach, considering the child's individual needs and best interests. Decisions will be made in partnership with parents or carers wherever possible, unless doing so would place the child at significant risk of harm. Staff will have regard to DfE Guidance for Schools and Colleges: Gender Questioning Children (2024) and KCSIE 2025, including how to address wider vulnerabilities such as bullying or emotional distress.

12.3 Risks can be compounded where children lack trusted adults. Staff will endeavour to reduce barriers, promote open communication, and ensure appropriate pastoral and safeguarding support.

13.0 Sexual violence

- 13.1 Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent.
- 13.2 Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.
- 13.3 All incidents will be managed in line with this policy and Part 5 of Keeping Children Safe in Education (2025).
- 13.4 Online sexual abuse concerns may also arise through alerts identified by the School's filtering and monitoring systems, in accordance with DfE Filtering and Monitoring Standards (2025).

14.0 Harmful sexual behaviour

- 14.1 Harmful sexual behaviour (HSB) refers to sexually inappropriate, problematic, abusive, or violent behaviour that is developmentally inappropriate and may cause developmental damage. It can occur online, offline, or across both environments.
- 14.2 Sexual behaviour between children may be considered harmful where there is a significant age or developmental difference, or where a power imbalance exists (for example, due to disability, social status, or vulnerability). HSB can include coercion, sexualised bullying, grooming, or image-based abuse, including use of AI-generated or deepfake material.
- 14.3 Staff must report all concerns immediately to the Designated Safeguarding Lead (DSL). The DSL will make referrals to children's social care and/or the police as appropriate, in line with statutory guidance and local safeguarding partnership threshold criteria, and ensure proportionate support for all children involved.
- 14.4 All concerns, decisions, risk assessments, and the rationale for actions will be recorded in writing and stored securely.

15.0 Sexual violence and sexual harassment between children

- 15.1 Sexual violence and sexual harassment can occur between two children of any age and any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment are never acceptable and is not an inevitable part of growing up. The evidence shows that girls are more likely to be subject to sexual violence and sexual harassment than boys, and that boys are more likely to perpetrate such violence and harassment. The School will endeavour to do all that we can to foster healthy and respectful relationships between children including through Relationship and Sex Education and Personal Social Health and Economic Education.
- 15.2 Sexual harassment is unwanted conduct of a sexual nature and can occur online and offline. It may include sexual comments, sexting, sexual jokes or physical behaviour such as deliberately brushing against someone or interfering with someone's clothes (although this may be potentially criminal in nature), and displaying pictures, photos or drawings of a sexual nature. Staff may not become aware of child-on-child sexual violence or sexual harassment from a direct disclosure but may overhear a conversation or notice a change in a child's behaviour.
- 15.3 Sexual violence is a crime and covers sexual offences under the Sexual Offences Act 2003 including rape, assault by penetration or sexual assault. The age of consent for sexual intercourse is 16 years old. A child under the age of 13 years old can never consent to any sexual activity. The School will refer alleged crimes of sexual violence to the police.
- 15.4 If the Designated Safeguarding Lead considers that a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care and the police where appropriate if a criminal offence may have been committed, in line with local safeguarding partnership thresholds
- 15.5 If there has been a report of sexual violence, the Designated Safeguarding Lead should make an immediate risk and needs assessment. The School will consider appropriate action to take to support the victim and in relation to the alleged perpetrator. The ages of the children will be critical factors to consider. Sexual behaviour between children may be particularly harmful if one of the children is much older (more than two years difference in age). Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

- 15.6 The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the Designated Safeguarding Lead who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the Designated Safeguarding Lead will balance the victim's wishes against their duty to protect the victim and other children.
- 15.7 The School will consider intra familial harms and whether any support for siblings is necessary following an incident.
- 15.8 For all cases of sexual violence and sexual harassment, the ongoing proximity of the victim and alleged perpetrator will be considered immediately. For reports of rape and assault by penetration, the alleged perpetrator will be removed from any classes shared with the victim whilst the School investigates the matter and liaises with other agencies. The School will also consider how best to keep the victim and alleged perpetrator apart on School premises and on transport to and from School.
- 15.9 There are four likely scenarios for the School to consider when managing reports of sexual violence and/or sexual harassment, but all should be underpinned by the principle that the School takes a zero-tolerance approach to sexual violence and sexual harassment:
- 15.9.1 Manage internally: for example, where an incident of sexual harassment is a one-off;
- 15.9.2 Early help: providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse (i.e. addressing non-violent harmful sexual behaviour and preventing the escalation of sexual violence);
- 15.9.3 Referral to children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger. At the point of referral the child's parents or carers will be notified unless there is a compelling reason not to; or
- 15.9.4 Report to the police (generally in parallel with a referral to children's social care): where there has been a report of rape, assault by penetration or sexual assault, even if the alleged perpetrator is under 10 years old, the school will still refer to the police for advice

15.10 The School will consider a range of other options in dealing with incidents of sexual harassment or sexual violence depending on the seriousness and the circumstances of each case. These may include pastoral support and referrals to Child and Adolescent Mental Health Services (CAMHS). An alleged perpetrator may be suffering from abuse as well as potentially posing a risk of harm to other children. The School will take advice from children's social care. The School will also where appropriate apply its Behaviour and Discipline policy and Exclusions policy. All decisions and actions should be regularly reviewed and policies updated to reflect lessons learnt.

15.11 If a report of child-on-child sexual assault or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the child and/or the person who made the allegation is in need of help or may have been abused by someone else. A referral to children's social care may be appropriate. The Head teacher will consider whether to take disciplinary action in accordance with the School's Behaviour and Discipline policy. The DSL will ensure appropriate and ongoing support for victims, including pastoral and therapeutic help, and regular review of their safety and wellbeing.

15.12 Where incidents involve the creation or sharing of sexual images, the School will follow the DfE (2024) 'Sharing Nudes and Semi-Nudes' guidance.

16.0 Child sexual exploitation, child criminal exploitation and County lines

16.1 Both child sexual exploitation and child criminal exploitation are a form of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into taking part in sexual or criminal 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.

16.2 Both CSE and CCE can occur entirely online, through social media, gaming, encrypted messaging, or AI-generated material used for grooming or coercion.

16.3 Child sexual exploitation is a form of child sexual abuse and can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. Child sexual exploitation 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). It can affect any child, including 16 and 17 year olds who can legally consent to have sex and who may believe they are in a genuine romantic relationship.

16.4 A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Patterns of absence or children missing from education will always be considered as potential indicators of exploitation. Staff should consider whether some of the following signs may be indicators of sexual exploitation and refer suspected cases and complaints of sexual exploitation to the Designated Safeguarding Lead, keeping in mind that this list is non-exhaustive:

16.4.1 Children who appear with unexplained gifts or new possessions;

16.4.2 Children who have older boyfriends or girlfriends;

16.4.3 Children who suffer from sexually transmitted infections or become pregnant; and

16.4.4 Children who regularly miss school or education or disengage from education.

16.5 Child criminal exploitation is a geographically widespread form of harm that is a typical feature of county lines criminal activity (drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns), working in cannabis factories, shoplifting or pickpocketing. Perpetrators can trap victims by threatening the victim (and their family) with violence, entrapping and coercing them into debt. Staff should consider whether some of the following signs may be indicators of child criminal exploitation and refer suspected cases and complaints of criminal exploitation to the Designated Safeguarding Lead, keeping in mind that this list is non-exhaustive:

16.5.1 Children who appear with unexplained gifts or new possessions;

16.5.2 Children who associate with other young people involved in exploitation;

16.5.3 Children who misuse drugs and alcohol;

16.5.4 Children who go missing for periods of time or regularly come home late;
and

16.5.5 Children who regularly miss school or education or do not take part in
education.

16.6 Staff should be aware 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 girls are at risk of criminal exploitation too. Both boys and girls being criminally exploited may be at a higher risk of sexual exploitation.

16.7 Staff should be aware that county lines exploitation: can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Staff should make referrals to the Designated Safeguarding Lead where appropriate who may refer cases to the National Referral Mechanism, in line with Home Office guidance.

16.8 The DSL will ensure that victims of CCE or CSE receive appropriate support, including liaison with early help, children's social care, and specialist exploitation services.

16.9 Online alerts or digital behaviour identified through filtering and monitoring systems may also indicate exploitation and will be reviewed by the DSL.

17.0 Domestic abuse

17.1 The Domestic Abuse Act 2021 introduced the first statutory definition of domestic abuse and recognises the impact of domestic abuse on children as victims in their own right if they see, hear, or experience its effects. The definition includes a range of abusive behaviours — psychological, sexual, physical, emotional, and economic — and coercive or controlling behaviour. It applies where both individuals are aged 16 or over and are “personally connected,” including current or ex-partners and family members. Types of domestic abuse may include intimate partner violence, abuse by family members, teenage relationship abuse (between peers), and child/adolescent-to-parent violence.

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

17.3 Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Exposure to domestic abuse can negatively affect a child's behaviour, attendance, attainment, and ability to form trusting relationships.

17.4 Young people can also experience domestic abuse within their own intimate relationships. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

17.5 Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy. Online coercion, tracking, or harassment through digital means may also form part of domestic abuse and will be monitored through the School's filtering and monitoring systems.

17.6 School staff can contact Operation Encompass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

17.7 The Designated Safeguarding lead will provide support according to the child's needs and update records about their circumstances, liaise with children's social care and specialist domestic abuse services, and ensure appropriate ongoing pastoral and safeguarding support.

18.0 Online safety

18.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. Online safety will be taught to children and will be considered when planning the curriculum. The issues classified within online safety can be categorised as follows:

18.1.1 content: being exposed to illegal, inappropriate or harmful content (pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism);

- 18.1.2 contact: being subjected to harmful online interaction with other users (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);
- 18.1.3 conduct: personal online behaviour that increases the likelihood, or causes, harm (making, sending and receiving explicit images and online bullying); and
- 18.1.4 commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If pupils or staff are at risk, the Designated Safeguarding Lead where appropriate may refer cases to the Anti-Phishing Working Group or other relevant agencies
- 18.2 All staff receive annual training on online safety, including understanding the school's filtering and monitoring systems and how to report online concerns. Online safety education is embedded across the curriculum and PSHE to equip pupils to identify, manage, and report online risks.
- 18.3 Mobile phones give many children unlimited and unrestricted access to the internet. All children must adhere to the School's Acceptable Use of IT Policy.
- 18.4 Appropriate filters and monitoring systems should be put in place on school devices and school networks to limit children's exposure to risks from the School's IT system, taking into account the number of and age range of the children, those who are potentially at greater risk of harm, and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- 18.5 The DSL will review and respond to monitoring alerts, ensuring appropriate safeguarding action is taken. Any AI-generated sexual or indecent imagery depicting a child will be treated as child sexual abuse material and reported to the DSL and/or the police.
- 18.6 The Headteacher and Trustees will complete and review a Filtering and Monitoring Risk Assessment at least annually, or whenever there is a significant change in technology use, ensuring full compliance with the DfE Filtering and Monitoring Standards (2025). The Headteacher leads the annual filtering/monitoring risk assessment, with trustee oversight. The School will:
- 18.6.1 Assign clear roles for technical and safeguarding review;
- 18.6.2 Review filter lists, monitoring alerts, false positives, and teaching impact;
- 18.6.3 Log and analyse AI-related risks (e.g. deepfakes, sextortion, deepfake imagery) and report termly trends to the DSL and trustees;

- 18.6.4 Provide staff, pupil and parent education on emerging online harms.
- 18.7 The appropriateness of the School's filters and monitoring systems will be informed by the Filtering and Monitoring Standards, the Cyber Security Standards for Schools and Colleges, and the Prevent Duty risk assessment. Cybersecurity protection measures will be reviewed periodically to stay current with evolving online and AI-related risks. The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.
- 18.7.1 Other specific issues (per KCSIE Annex B).
- 18.8 Staff are trained to recognise and respond to all safeguarding issues listed in Annex B of KCSIE 2025, including (but not limited to) child trafficking and modern slavery, private fostering, young carers, children with family members in prison, children who are homeless or at risk of homelessness, children and the court system, and child abduction and community safety incidents.
- 18.9 Where concerns arise, staff must inform the DSL immediately.
- 19.0 Duty of staff, trustees and volunteers
- 19.1 Children are more likely to report concerns to a trusted adult at the School. Children will be made aware that they may report concerns to a member of staff at any time.
- 19.2 Every member of staff and trustee of the School as well as every volunteer who assists the School is under a general legal duty:
- 19.2.1 to protect children from abuse;
- 19.2.2 to be aware of the School's safeguarding procedures and to follow them;
- 19.2.3 to keep a sufficient record of any significant concern, conversation or event but not to investigate the matter; and
- 19.2.4 to report any matters of concern to the Designated Safeguarding Lead.
- 19.3 The Designated Safeguarding Lead will consult with children's social care where a child is at risk of harm. If the Designated Safeguarding Leads and Deputy Designated Safeguarding Leads are exceptionally unavailable and a child is at risk of harm, a member of staff must refer them directly to children's social care and/or the police immediately.

19.4 All staff are required to report to the Headteacher — or to the Chair of Trustees if the concern relates to the Headteacher — any concern or allegation that a member of staff has harmed or poses a risk of harm to children. All concerns will be taken seriously. There will be no retribution or disciplinary action taken against a member of staff for making such a report in good faith. All concerns about staff, including low-level concerns, will be recorded and managed in line with Part 4 of Keeping Children Safe in Education (2025) and the procedures set out in this policy and the Staff Code of Conduct. Pupils are taught to understand and manage risk through the School's curriculum and all aspects of school life. Pupils are reminded regularly about online safety and must comply with our Acceptable Use of ICT policy and Anti-Bullying policy. Pupils are encouraged to speak to a member of staff in confidence about any concerns.

19.5 All safeguarding concerns and records must be stored securely, separately from pupil academic files, and in line with statutory guidance on record retention and transfer. The School's complaints procedure will be followed where a pupil or parent raises a concern about poor practice that initially does not reach the threshold for child protection action.

19.6 The school promotes a culture of openness, transparency, and professional challenge to ensure that all staff feel able to raise safeguarding concerns without fear of reprisal.

19.7 Concerns that a system, policy, or practice is placing children at risk should be raised with the Headteacher or Chair of Trustees. Staff and volunteers can use the school's whistleblowing route or Ofsted's Whistleblowing Line (0300 123 3155). Staff may also contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 if they do not feel able to raise concerns internally.

19.8 All concerns and allegations are taken seriously and will be handled in accordance with Part 4 of Keeping Children Safe in Education (2025). No one will face detriment or disciplinary action for raising a concern in good faith. However, any allegation found to be deliberately false or malicious will be addressed in line with the School's conduct or behaviour policy.

20.0 Procedures

20.1 A member of staff suspecting or hearing a disclosure, concern, or allegation of abuse: must listen carefully to the child and keep an open mind;

20.2 must not ask leading questions, that is, a question which suggests its own answer;

- 20.3 must reassure the child that what they share will be taken seriously, but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken;
- 20.4 must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence;
- 20.5 must ensure that the child's wishes and feelings are taken into account when determining the action to take and services to provide;
- 20.6 must reassure the child that they are being taken seriously and that they will be supported and kept safe. The victim must never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and should never be made to feel ashamed for making a report;
- 20.7 must be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the Designated Safeguarding Lead if they have concerns; and
- 20.8 must determine how best to build trusted relationships with children and young people which facilitate communication.
- 20.9 All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers), must be preserved. All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. Records must be stored securely, separately from academic files, and transferred promptly to any new school or setting in accordance with statutory guidance.
- 20.10 All suspicions, disclosures, or allegations of abuse must be reported immediately to the Designated Safeguarding Lead or if the complaint involves a member of staff to the Head teacher. If the Designated Safeguarding Lead or deputies are unavailable and a child is at immediate risk of harm, staff must contact children's social care and/or the police directly and then inform the DSL as soon as possible.
- 20.11 The action to be taken by the Designated Safeguarding Lead will take into account:
- 20.11.1 the local practice guidance of the Gloucestershire Safeguarding Children Partnership;

20.11.2 the nature and seriousness of the concern or allegation. Where a pupil is suffering or is likely to suffer from harm, referral to social care and if appropriate the police for a criminal offence must be made immediately;

20.11.3 the wishes of the pupil, provided that the pupil is of sufficient understanding and maturity. However, there may be times when the situation is so serious that decisions may need to be taken, after appropriate consultation, that override a pupil's wishes; and

20.11.4 The wishes of the pupil's parents will be considered, provided these do not conflict with the child's best interests. Parents will normally be informed of safeguarding concerns or referrals, unless doing so would place the child at greater risk of harm. Where there is doubt, the Designated Safeguarding Lead will seek advice from children's social care and/or the police before any contact is made.

20.12 Allegations or reports of abuse by pupils (child-on-child abuse) will be managed in line with Part 5 of Keeping Children Safe in Education (2025). The school will take all appropriate action to safeguard and support all children involved, including the alleged victim and perpetrator. Behaviour and Suspensions and exclusion policies will apply where relevant.

20.13 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

21.0 Staff Behaviour Policy

21.1 All staff working at the School play an important part in keeping children safe. The School promotes a culture of professionalism, integrity, and vigilance to ensure a safe environment for pupils and staff.

21.2 · This policy forms part of the School's Staff Code of Conduct and aligns with the Safer Working Practice Guidance for those working with children and young people in education settings (Safer Recruitment Consortium).

21.2.1 The School wants to promote a safe working environment for everyone on the school site. In order to keep themselves safe from possible allegations, staff must follow this advice:

21.2.2 Always set a good example by conducting yourself appropriately.

21.2.3 Always maintain appropriate standards of conversation with pupils, this includes language used in emails which should always remain professional.

- 21.2.4 Always use school equipment for schoolwork and personal equipment for personal use.
- 21.2.5 Always report any inappropriate behaviour from a pupil to the Designated Safeguarding Lead.
- 21.2.6 Always be aware that contact made outside of the School environment or online with a pupil may be considered inappropriate and could lead to your interaction being misinterpreted.
- 21.2.7 Never share or request personal contact details (e.g. personal phone numbers, addresses, or social media connections) with or from pupils. Never accept personal information from a pupil – for example their mobile phone number or email address.
- 21.2.8 Never instigate or respond to physical contact with pupils unless it is appropriate to your role. If this occurs, then report it immediately to the Designated Safeguarding Lead.
- 21.2.9 Never accept physical or verbal abuse from a pupil. Do not respond yourself but report it immediately to the Designated Safeguarding Lead.
- 21.2.10 Never put yourself at risk working individually with pupils. Whenever possible, ensure that another adult knows where you are and be visible and/or audible (for example, open the door). Staff working with children must be aware of the risk of abuse by adults or other young people. If you have concerns about a child's safety:
- 21.2.11 Immediately inform the Designated Safeguarding Lead;
- 21.2.12 If it concerns a member of staff or volunteer, then report it to the Head teacher or if it relates to the Head teacher to the Chair of Trustees;
- 21.3 Staff must follow the School's policies on Physical Contact, Searching, Screening and Confiscation, and Online Safety when dealing with incidents.
- 21.4 Staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

22.0 Dealing with safeguarding concerns or allegations made about staff (including supply teachers, volunteers and contractors)

22.1 The School has procedures for dealing with allegations against staff (including supply staff and volunteers who work with children), in line with Part 4 of KCSIE 2025. These aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from unfounded allegations.

22.2 Some allegations might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the School (allegations that may meet the harms threshold):

22.2.1 behaving in a way that has harmed a child, or may have harmed a child;

22.2.2 possibly committing a criminal offence against or related to a child;

22.2.3 behaving towards a child in a way that indicates he or she may pose a risk of harm if he or she worked regularly or closely with children; and/or

22.2.4 behaving or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside of School).

22.3 Concerns that do not meet the harms threshold but indicate that a staff member may have acted inappropriately or breached professional boundaries will be treated as “low-level concerns.” These will be recorded, reviewed, and addressed in accordance with the School’s safeguarding and conduct procedures.

22.4 Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

22.5 Where an allegation or complaint is made against any member of staff or a volunteer, the matter should be reported immediately to the Head teacher or in his absence the Chair of the Trustees. The Head teacher will liaise with the Designated Safeguarding Lead and all allegations that appear to meet the criteria will be discussed with the LADO (within one working day) before further action is taken. Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Any doubts or concerns over apparently borderline cases will be discussed informally with the LADO, initially on a "no names" basis.

- 22.6 Where an allegation is made against the Head teacher, the person receiving the allegation should immediately inform the Chair of the Trustees, or in his absence the Vice Chair, without first notifying the Head teacher. If an allegation is made against the Chair of the Trustees, the allegation should be reported to the Head teacher. Any such allegations will be discussed with the LADO (within one working day) before further action is taken.
- 22.7 Where an allegation is made against a supply teacher the matter should be reported immediately to the Head teacher or in their absence the Chair of the Trustees. The Head teacher will liaise with the Designated Safeguarding Lead and all allegations that appear to meet the criteria will be discussed with the LADO (within one working day) before further action is taken. The School will fully involve the relevant agency and take the lead on any investigation and the supply teacher should be advised to contact their trade union representative if they have one, or a colleague for support. In no circumstances should the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.
- 22.8 The Head teacher will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it. Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head teacher should not inform the accused or the parents until these agencies have been consulted and it has been agreed what information can be disclosed. The parents should be kept informed of the progress of the case, including the outcome of any disciplinary process in confidence. Parents should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing.
- 22.9 A school has a duty of care towards its staff and as such, it must ensure that effective support is provided for anyone facing an allegation. A member of staff should be informed of allegations as soon as possible and given an explanation of the likely course of action, unless there are objections from external agencies. The member of staff should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the School. A representative will be appointed to keep the member of staff informed of the progress of the case and will consider whether other support should be made available.

- 22.10 Where an investigation by the police or the local authority children's social care services is unnecessary, the LADO will discuss the steps to be taken with the Head teacher (or the Chair of the Trustees). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.
- 22.11 It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the Head teacher or Chair of the Trustees, how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff but, in some instances, it may be appropriate to appoint an independent investigator.
- 22.12 Confidentiality must be maintained while any allegation is being investigated, in accordance with statutory restrictions and to protect all parties.
- 22.13 Suspension must not be an automatic response to an allegation and should only be considered in a case where:
- 22.13.1 there is cause to suspect a child or other children at the School is or are at risk of harm; or
- 22.13.2 the allegation is so serious that it might be grounds for dismissal.
- 22.14 The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment. If there is no reasonable alternative to suspension and suspension is deemed appropriate, the reasons and justification for this will be recorded and the member of staff notified of the reasons.
- 22.15 The School will consult with the LADO following the conclusion of any social care services investigation or criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the investigation or trial and the standards of proof applicable.
- 22.16 If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and the provision of a mentor to provide assistance in the short term. The School will also consider how to manage any contact with the child who made the allegation.

- 22.17 If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used. There will be a prompt and detailed report to the Disclosures and Barring Service as soon as possible if it is thought that the member of staff or volunteer has engaged in conduct that has harmed or is likely to harm a child; or has committed a relevant offence; or if a person has been removed from working in regulated activity or would have been if they had not left. For teachers, a report must also be made to the Teaching Regulation Agency. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Board of Trustees without delay.
- 22.18 If a member of staff or volunteer tenders their resignation any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the DBS, and for teachers, the Teachers' Regulation Agency, in appropriate circumstances.
- 22.19 All allegations must be managed promptly, fairly, and in accordance with Part 4 of KCSIE (2025), without unnecessary delay. Where the allegation is complex or requires independence, the Headteacher (or Chair of Trustees) will appoint an appropriate external or independent investigator to ensure transparency and objectivity. Where the School receives an allegation relating to an incident that happened when an individual or organisation was using the School premises for the purposes of running activities for children, the School will inform the LADO and comply with the procedures set out in this Child Protection and Safeguarding Policy. The School will liaise with the organisation in respect of further steps to be taken where appropriate.
- 22.20 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head teacher will consider whether to take disciplinary action in accordance with the School's Behaviour and Discipline policy. Whether or not the person making the allegation is a pupil or a parent or other member of the public, the School reserves the right to contact the police to determine whether any action might be appropriate.
- 22.21 Allegations that are unfounded (there was no evidence) not substantiated (there was insufficient evidence to prove or disprove), are false (sufficient evidence to disprove) or malicious (there was a deliberate act to deceive) will not be referred to in employer references. Substantiated allegations where there was sufficient evidence to prove the allegation must be referred to in employer references.

22.22 On conclusion of the case, where the allegations is concluded to be either unfounded, malicious or unsubstantiated, the School will consider the facts and determine whether any lessons can be learned and if improvements can be made to procedure.

22.23 Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of 10 years from the date of the allegation, if this is longer, unless the allegation was found to have been malicious, in which case it will be removed from the employee's records. The record should include a clear and comprehensive summary of the concern, details of how the concerns was followed up and resolved, and a note of any action take, decisions reached and the outcome and a declaration on whether the information will be referred to in any future reference.

22.24 In the case of an allegation against a member of teaching staff at the School, consideration will be made as to whether to refer the matter to the Teaching Regulation Authority. In addition, the School will make a referral to the DBS where it is considered that an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.

22.25 Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

22.26 After the case is concluded, the School will review the circumstances to identify lessons learned and make improvements to safeguarding procedures where necessary.

23.0 Dealing with concerns or allegations that do not meet the harm threshold

23.1 The section is based on 'Section 2: Concerns or allegations that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education 2025.

23.2 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.

23.3 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:

23.3.1 Is inconsistent with the staff code of conduct or Safer Working Practice Guidance, including inappropriate conduct outside of work, and

23.3.2 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

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

23.4.1 Being overly friendly with children

23.4.2 Having favourites

23.4.3 Taking photographs of children on their mobile phone

23.4.4 Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

23.4.5 Humiliating children

23.5 Concerns may arise through, for example:

23.5.1 Suspicion

23.5.2 Complaint

23.5.3 Safeguarding concern or allegation from another member of staff

23.5.4 Disclosure made by a child, parent or other adult within or outside the School

23.5.5 Pre-employment vetting checks

23.6 All staff should share concerns, however small or uncertain, with the Headteacher (or Chair of Trustees if the concern relates to the Headteacher). Staff must not assume another colleague has raised it.

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

23.8 Staff should self-refer where they have found themselves, for example, in a situation which could be misinterpreted, might appear compromising to others, even if they believe they acted appropriately and/or on reflection they believe they behaved in such a way that they consider falls below the expected professional standards.

- 23.9 All low-level concerns should be shared responsibly and recorded in accordance with the school's safeguarding policies.
- 23.10 We recognise the importance of creating a culture of openness, trust and transparency in which the School's values and expected behaviour are constantly lived, monitored and reinforced by all staff and all staff are encouraged to confidentially share low-level concerns so that they can be addressed appropriately.
- 23.11 We will create this culture by:
- 23.11.1 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
 - 23.11.2 Empowering staff to share any low-level concerns as per section 7.7 of this policy
 - 23.11.3 Empowering staff to self-refer
 - 23.11.4 Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
 - 23.11.5 Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
 - 23.11.6 Helping to identify any weakness in the School's safeguarding system
- 23.12 If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:
- 23.12.1.1 Directly to the person who raised the concern, unless it has been raised anonymously
 - 23.12.2 To the individual involved and any witnesses
 - 23.12.3 The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the School's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.
- 23.13 Record keeping:
- 23.13.1 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.

23.13.2 Records will be:

23.13.2.1 Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

23.13.2.2 Reviewed regularly 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

23.13.2.3 Retained at least until the individual leaves employment at the School

23.14 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. Where appropriate, and if the individual works across more than one setting, the School will seek to ensure that relevant safeguarding information is shared in line with data protection and safeguarding legislation. We will not include low-level concerns in references unless:

23.14.1 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

23.14.2 The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

23.15 If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head teacher will consult with the LADO and take a more collaborative decision-making approach.

24.0 Early Help

24.1 Early help means providing support as soon as a problem emerges at any point in a child's life. Staff should identify emerging problems, liaise with the Designated Safeguarding Lead, share information with other professionals to support early identification and in some cases undertake an early help assessment. Set out at Annex 1 are details of some of the early help offers provided by the School.

24.2 If early help is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

24.3 All staff should be particularly alert to the potential need for early help for a child who:

24.3.1 is disabled or has certain health conditions and has specific additional needs

24.3.2 has special educational needs (whether or not they have a statutory education, health and care plan)

24.3.3 has a mental health need

24.3.4 is a young carer

24.3.5 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

24.3.6 is frequently missing/goes missing from education, home or care

24.3.7 has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges, and in Alternative Provision or a Pupil Referral Unit;

24.3.8 is misusing drugs or alcohol themselves

24.3.9 is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

24.3.10 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse

24.3.11 has a parent or carer in custody, or is affected by parental offending

24.3.12 is showing early signs of abuse and/or neglect

24.3.13 is at risk of being radicalised or exploited

24.3.14 is at risk of so-called 'honour'-based abuse, such as female genital mutilation or forced marriage

24.3.15 is experiencing, or is at risk of experiencing family ostracism

24.3.16 is a privately fostered child

24.4 Children's social care assessments should consider where children are being harmed in contexts outside the home, so the School must provide as much information as possible as part of any referral to local authority children's social care.

25.0 Safe recruitment practices

- 25.1 At our School we endeavour to recruit staff with suitable qualifications and personal attributes for the vacancies available. The following system is followed when recruiting staff in order to safeguard children in our care.
- 25.2 An advertisement is placed in The Times Educational Supplement, E Teach and/or local press giving a brief description of the post available and deadline dates. The person specification will set out details of qualifications, experience and any other requirements needed to perform the role in relation to working with children. The job description clearly states the main duties and responsibilities of the post and the individual's responsibility for promoting and safeguarding the welfare of children.
- 25.3 The job application form requires the following:
- 25.3.1 applicants to provide their full identifying details including current and former names, date of birth, current address and National Insurance number
 - 25.3.2 a statement of any academic and/or vocational qualifications the applicant has obtained that are relevant to the position for which they are applying with details of the awarding body and date of award
 - 25.3.3 a full history in chronological order since leaving secondary education, with start and end dates, explanations for periods not in employment, education or training and reasons for leaving employment
 - 25.3.4 a declaration of any family or close relationship to existing employees or employers (including trustees)
 - 25.3.5 details of referees including one referee who is the applicant's current or most recent employer. If an applicant has worked with children in the past a reference from that employer should be included
 - 25.3.6 a statement concerning whether the person is medically, physically and mentally fit to carry out the duties of the position for which they are applying and
- 25.4 a statement concerning whether the person has any convictions, cautions or bind-overs.
- 25.5 The job application form will include a copy of the School's Safeguarding policy.
- 25.6 Two members of staff will carry out a shortlisting exercise. Shortlisted candidates will be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate will be asked to physically sign a hard copy of the application at point of interview.

- 25.7 All applications will be scrutinised to ensure that they are properly completed and that the information provided is consistent and does not contain any discrepancies. The interview request will include the interview programme and require the applicant to bring with them original copies of their qualification certificates, passport, driving licence, birth certificate and utility bill showing the applicants current name and address.
- 25.8 As part of the shortlisting process, the School will consider carrying out an online search as part of its due diligence on the shortlisted candidates to help identify any incidents or issues that have happened, and are publicly available online, which the School might want to explore with the applicant at interview. The School will inform the shortlisted candidates that online searches may be done as part of due diligence checks.
- 25.9 Interviews will usually be conducted by two or more of the following people as required: Head teacher, Deputy Head teacher, Assistant Headteacher, HR Manager, Head of Catering, Head of Department or a member of the Board of Trustees. At least one of the interview panel will be a member of staff who has been trained in safer recruitment.
- 25.10 An offer of appointment to the successful candidate will be conditional upon the receipt of at least two satisfactory references, verification of the candidate's identity, verification of qualifications and satisfactory completion of the probationary period.
- 25.11 references will be obtained before interview wherever possible, to allow any issues to be explored during the selection process. The School follows the Department for Education's recommendations for the safer recruitment of staff who work with children. All members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff are subject to statutory child protection checks before starting work. All members, trustees, members of a local governing body, volunteer helpers, contractors working regularly during term-time, such as contract catering staff are also vetted. A supervised volunteer who regularly teaches children is not in regulated activity. An enhanced DBS certificate which includes a barred list check will be required for a member of staff who engages in regulated activity. For trustees and others not engaged in regulated activity, an enhanced DBS certificate without the barred list check should be conducted.
- 25.12 Where an individual has lived or worked outside the UK, additional overseas checks, such as certificates of good conduct or equivalent, will be undertaken in line with KCSIE 2025 and Home Office guidance.

25.13 Right to work in the UK checks will be undertaken in accordance with Home Office requirements, including any necessary follow-up for time-limited visas.

25.14 The School will keep a single central record for staff, volunteers, members, trustees on whether the following checks have been carried out:

25.14.1 an identity check;

25.14.2 a barred list check;

25.14.3 an enhanced DBS certificate;

25.14.4 a prohibition from teaching check;

25.14.5 a section 128 check for management positions as an employee or trustee;

25.14.6 checks on people who have lived or worked outside the UK;

25.14.7 a check on professional qualifications; and

25.14.8 a check to establish the person's right to work in the UK.

25.15 The SCR will also record the date each check was completed, the outcome, and the initials of the person carrying out the check.

26.0 Confidentiality and information sharing

26.1 The School will keep all child protection records confidential, securely and separately from the main pupil file, allowing disclosure only to those who need the information in order to identify and tackle all forms of abuse and safeguard and promote the welfare of children, including their educational outcomes. The School will co-operate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations in accordance with the requirements of Working Together to Safeguard Children(2023), Keeping Children Safe in Education (2025), and Information Sharing: Advice for Practitioners (DfE, 2024).

26.2 Staff must never promise confidentiality to a child who discloses abuse or neglect. Information will only be shared with those who need to know to protect the child.

26.3 The School recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Information sharing will always be proportionate, relevant, adequate, accurate, timely and secure

- 26.4 Where the School needs to share special category personal data, the Data Protection Act 2018 contains “safeguarding of children” as a processing condition that allows the sharing of information. The School will endeavour to gain consent to share information but information may be shared without consent if it is not possible to gain consent, it can not be reasonably expected that the School gains consent or if to gain consent would place a child at risk.
- 26.5 The School will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:
- 26.5.1 being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as ‘special category personal data’;
 - 26.5.2 understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk; and
 - 26.5.3 not providing pupils’ personal data where the serious harm test is met.
- 26.6 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and social services to agree the information that should be disclosed and to whom. The School will make every effort while allegations are investigated to maintain confidentiality and guard against unwanted publicity.
- 26.7 The Head teacher should take advice from the LADO, police and children’s social care services to agree:
- 26.7.1 who needs to know and, importantly, exactly what information can be shared;
 - 26.7.2 how to manage speculation, leaks and gossip;
 - 26.7.3 what, if any, information can be reasonably given to the wider community to reduce speculation; and
 - 26.7.4 how to manage press interest if, and when, it should arise.
- 26.8 This section is underpinned by the DfE’s Information Sharing Advice for Practitioners (2024), which sets out the seven golden rules for sharing information to safeguard children.

27.0 Monitoring

27.1 Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School and a prompt report to the Board of Trustees. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures.

27.2 If any concerns are raised by the LADO or Ofsted, or safeguarding partners, about safeguarding issues, the following actions should be taken:

27.2.1 The Designated Safeguarding Lead must carry out an investigation as a priority and comply with any deadlines given;

27.2.2 The Chair of the Trustees must report to the LADO or Ofsted on the findings of the investigation and set out any action to be taken; and

27.2.3 The School must endeavour to comply as soon as possible with any recommendations from the LADO or Ofsted.

27.3 The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and will make an annual report to the Board of Trustees.

27.4 In line with Working Together 2023, the DSL will receive formal reflective supervision at least termly. Staff with safeguarding responsibilities will also have access to supervision and professional support

27.5 The Board of Trustees will undertake an annual review of this policy. It will ensure that any weaknesses in regard to child protection arrangements are remedied without delay. Trustees will also ensure that the DSL is given sufficient time, training, and resources to fulfil their statutory responsibilities effectively.

28.0 Data protection

28.1 The School processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which include specific provisions permitting the sharing of information for the purposes of safeguarding children.

28.2 Pupils, and in some cases their parents or carers, have the right to request access to personal information held by the School. However, exemptions under the Data Protection Act may apply if disclosure would place a child at risk of harm. Legal or safeguarding advice should always be sought before releasing any safeguarding records.

28.3 · The School keeps safeguarding and child protection records confidential and stored separately from academic files, allowing access only to those staff who need the information in order to safeguard and promote the welfare of children.

28.4 Information will be shared with other agencies such as children's social care, police or health professionals where necessary to protect a child or prevent harm, in line with the DfE Information Sharing Advice for Practitioners (2024).

28.5 Safeguarding record-keeping:

28.5.1 Records are factual, clear, and made promptly following a concern or disclosure.

28.5.2 Chronologies and body maps (where applicable) are maintained, and the rationale for all decisions is recorded.

28.5.3 All records are stored securely in line with data protection principles, with controlled access for authorised staff only.

28.5.4 Records are transferred securely when a child moves setting, and written confirmation of receipt is obtained.

28.5.5 The School follows the Information and Records Management Society (IRMS) Education Retention Schedule for record retention and disposal.

28.5.6 Regular audits of safeguarding files are conducted to ensure quality, accuracy, and completeness.

29.0 Contact numbers

29.1 The following telephone numbers may be useful:

29.1.1 ChildLine is a free confidential helpline for children: 0800 1111
www.childline.org.uk

29.1.2 The NSPCC: 0808 800 5000 www.nspcc.org.uk/kidszone

29.1.3 Ofsted's Whistleblower Hotline: 0300 123 3155.

29.1.4 The Samaritans: 116 123

29.1.5 Multi-Agency Safeguarding Hub (MASH): 01452 426565
childrenshelpdesk@gloucestershire.gov.uk

29.1.6 Operation Encompass: 01452 328953

30.0 Links with other policies

30.1 This policy should be read alongside and operates in conjunction with the following policies and documents:

30.1.1 Behaviour Policy

30.1.2 Staff Code of Conduct

30.1.3 Complaints Policy

30.1.4 Health and Safety Policy

30.1.5 Attendance Policy

30.1.6 Online Safety Policy (including IT Acceptable Use and roles for filtering and monitoring) Equality, Diversity and Inclusion Policy

30.1.7 Relationships, Sex and Health Education (RSHE) Policy

30.1.8 Anti-Bullying Policy

30.1.9 Whistleblowing Policy

30.1.10 Privacy Notices (Data Protection Act 2018 / UK GDPR)

Annex 1

1.0 Early Help at KLB

- 1.1 Early help means providing support as soon as a problem emerges, at any point in a child's life, to prevent issues from escalating. The School works within the Gloucestershire Safeguarding Children Partnership (GSCP) Levels of Intervention Guidance, the Gloucestershire Graduated Pathway of Early Help and Support, and the Early Help Pathway.
- 1.2 The Graduated Pathway provides a county-wide framework for identifying and meeting children's needs through a coordinated, proportionate response, using tools such as the My Profile, My Plan, My Assessment and My Plan+ to record and review progress. The School contributes to and leads on these processes as appropriate, ensuring that support is matched to the child's level of need and escalated when necessary.
- 1.3 The School's offer of early help is reviewed regularly by the DSL and senior leaders to ensure its effectiveness and that escalation to children's social care occurs when risk increases or early help is no longer sufficient.
- 1.4 The School's approach to early help and safeguarding is underpinned by relational practice. We recognise that secure, trusting relationships between staff and pupils are the foundation for identifying emerging needs and supporting positive change. Relational practice enables early intervention by promoting emotional safety, connection and accountability, reducing the need for crisis or punitive responses. Staff are trained in relational and trauma-informed approaches, ensuring that interactions are restorative, respectful and focused on repair and resilience.
- 1.5 The School's offer of early help addresses the early identification of risk and the prevention of harm to pupils. Outlined below are some of the strategies, systems and procedures the School has in place to safeguard pupils around specific aspects of safeguarding:

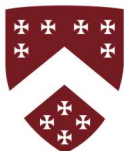
2.0 Examples of Early Help Provision at KLB

- 2.1 The School's offer of early help includes a wide range of internal and partnership support designed to address emerging needs and prevent harm:
- 2.2 Drugs screening and liaison with Gloucestershire's commissioned substance misuse service
- 2.3 Educational talks for Years 9–13 delivered by Gloucestershire's commissioned substance misuse service

- 2.4 Specialist workshops for pupils and parents on substance misuse and risk awareness
- 2.5 Theatre and workshop programmes such as Chelsea's Choice and County Lines exploring exploitation, consent and online safety
- 2.6 Referrals for bereavement support provided by a member of staff trained by Winston's Wish
- 2.7 Liaison with local GPs and CAMHS/CYPS to support referrals for clinical input
- 2.8 A full-time Attendance Lead to address attendance and persistent absence
- 2.9 Regular liaison with Family Support Services and Police Early Intervention Teams
- 2.10 Police mentoring for pupils presenting with anti-social or criminal behaviour
- 2.11 Use of the Gloucestershire Child Exploitation Screening Tool to identify risk early
- 2.12 Weekly internal triage meetings involving the DSL team, SENDCo, Attendance Lead, Head of Year, and other key staff to share information, assess risk, and coordinate early help or escalation.
- 2.13 PSHE lessons covering mental health, relationships and substance misuse, delivered by specialist educators with follow-up support where needed
- 2.14 Mapping of the PSHE curriculum against the PINK Curriculum to ensure comprehensive coverage of wellbeing and safeguarding themes
- 2.15 Awareness-raising assemblies and projects linked to Anti-Bullying Week and national safeguarding themes
- 2.16 A SEAL (Social and Emotional Aspects of Learning) spiral curriculum delivered through the tutor programme, developing emotional literacy, resilience, self-regulation, empathy, and healthy relationships
- 2.17 Sixth Form 'Buddy' (TIC) programme offering peer mentoring and transition support
- 2.18 Feedback from the School Council Wellbeing Group, which raises issues affecting pupils across the School
- 2.19 Parent and pupil signposting to local and national support agencies via the Gloucestershire Families Directory: <http://www.glosfamiliesdirectory.org.uk>
- 2.20 Police and school-led sessions for pupils and parents on sexting, consent and safe internet use

- 2.21 Participation in the Gloucestershire Healthy Living and Learning Survey to identify wellbeing trends and target intervention
- 2.22 The DSL implements the Gloucestershire Encompass Model, ensuring the school is informed of domestic abuse incidents affecting pupils and that timely support is provided

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