St James' CE Primary School is committed to the safeguarding of our pupils and staff.

St. James CE Primary School

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Child Protection & Safeguarding Policy 26-27



Statement of Vision and Values

In consultation with pupils, parents, governors, community members and staff our vision and values were generated based on our inspiration from the Parable of the Sower and how this links to our children and their journey with us.

Vision

Within our community we strive to develop deep roots, strong growth and freedom to flourish as a unique and whole child of God.

Matthew 13 - The Parable of the Sower – '… but the seed falling on good soil refers to someone who hears the word and understands it. …….produces a crop, yielding a hundred, sixty or thirty times what was sown."







Values

We decided at St James CE Primary School that Kindness and Respect are values which we feel underpin our vision and are incorporated in all we do and say – so therefore these two values will be taught alongside all the other six values we have chosen.

½ termly focus	Value
Autumn 1	Responsibility
Autumn 2	Friendship
Spring 1	Perseverance
Spring 2	Trust
Summer 1	Courage
Summer 2	Positivity

St James' CE Primary School is committed to the safeguarding of our pupils and staff.

This policy was reviewed in September 2026 in light of the changes to the Keeping Children Safe in Education document issued by the DfE (September 2026).

The policy is to be reviewed in September 2027.

Name of School	St James Primary School
Designated Safeguarding Lead	Lisa Everard
Deputy Designated Safeguarding Leads	Andrea Collins & Karyn Goodison
School Mental Health Lead	Michelle Sheehan
Executive Headteacher **Head of School**	Michelle Sheehan Lisa Everard
Contact number for all school members of staff as above:	02088041987
Safeguarding Governor	Louise Whitaker (Chair of Governors)
Contact email for Safeguarding Governor as above:	louise.whitaker@outlook.com
Multi-Agency Support Hub (MASH) contact number for discussing and reporting child protection concerns:	0208 379 5555
Local Authority PREVENT contact email:	prevent@enfield.gov.uk
Local Authority Designated Officer (LADO) and contact email:	Cathy Phelan Cathy.Phelan@enfield.gov.uk
NSPCC phone number:	0808 800 5000

St James' CE Primary School is committed to the safeguarding of our pupils and staff.

1.0 Introduction

1.1 The Governors and staff of St James CE Primary School fully recognises the role of the school, and all members of the school community, have in safeguarding children. We recognise that all staff, including volunteers, have a full and active part to play in protecting our pupils from harm.

1.2 All staff and Governors believe that our school should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child. We are committed to proactively identifying, assessing and responding to risks or concerns relating to the safety and welfare of children.

1.3 As per the definition stated in Keeping Children Safe in Education (September 2026), we recognise the definition of safeguarding to be:

* providing help and support to meet the needs of children as soon as problems emerge
* protecting children from maltreatment, whether that is within or outside the home, including online
* preventing the impairment of children's mental and physical health or development
* ensuring that children grow up in circumstances consistent with the provision of safe and effective care
* taking action to enable all children to have the best outcomes

1.4 The aims of this policy are:

1.4.1 To support the child's development in ways that will foster security, confidence and independence.
1.4.2 To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
1.4.3 To provide a systematic means of monitoring children known or thought to be at risk of harm.
1.4.4 To highlight the need for good levels of communication between all members of staff and to emphasise where confidentiality is crucial and where disclosure is imperative.
1.4.5 To develop a structured procedure within the school that will be followed by all members of the school community in cases of suspected abuse.
1.4.6 To maintain and promote effective working relationships with other agencies, especially the Police and Social Services.
1.4.7 To emphasise the links with the school's policy for safe recruitment of staff and volunteers, and for managing allegations.
1.4.8 To ensure that all adults within our school who have access to children have been checked as to their suitability.

1.4.9 To ensure that visitors to the school are made aware of this policy and what they should do if a child chooses to disclose to them.

2.0 Legislation and Statutory Guidance

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

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we

can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

3.0 Procedures

3.1 Our school procedures for safeguarding children will comply with the Local Safeguarding Partnership (LSP) procedures. The LSP have adopted and follow the All London Child Protection Procedures.

We will ensure that:

3.1.1 We have designated members of staff who undertake training every two years with updates at least annually; Mrs L Amin, Mrs M Sheehan, Ms R Headley and Mrs A Whittall.

3.1.2 All members of staff develop their understanding of the signs and indicators of abuse, and their role in safeguarding children, and refresh their training on a yearly basis.

3.1.3 All members of staff know how to respond to a pupil who discloses abuse or exploitation.

3.1.4 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures in the home-school agreement.

3.1.5 All staff will have read and understood the school Child Protection Policy at least annually and/or as part of the induction process.

3.1.6 All staff will have read and understood Part One of the most up-to-date version of the Government Guidance: Keeping Children Safe in Education at least annually and/or as part of the induction process.

3.1.7 All staff will receive ongoing continued professional development in relation to safeguarding and child protection throughout the academic year.

3.1.8 Our procedures will be reviewed and updated annually and/or in accordance with changes to government guidance and legislation.

3.1.9 All new members of staff will be given a copy of our child protection procedures as part of their induction into the school and these procedures will be explained so that all staff are aware of their responsibilities.

3.2 Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently exclude

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

3.2.1 To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

3.2.2 Abuse, neglect and exploitation are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Somebody may exploit a child by using them for someone else's advantage,

gratification or profit, for example by trafficking them or using them to transport drugs.

3.2.3 Abuse may be committed by adult men or women and by other children and young people. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and it is important to be aware that children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), criminal exploitation, serious youth violence, county lines, and radicalisation.

3.2.4 Keeping Children Safe in Education (DfE 2026) refers to four categories of abuse. These are set out within Appendix 1 of this policy.

3.3 Taking Action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key points for staff to remember for taking action are:

3.3.1 In an emergency take the action necessary to help the child, if necessary call 999.

3.3.2 Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

3.3.3 For any and all safeguarding and child protection concerns, report as soon as possible to the DSL, immediately if you can.

3.3.4 Do not start your own investigation.

3.3.5 Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.

3.3.6 Complete a record of concern and pass this to the DSL or deputy immediately.
3.3.7 If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps above.
3.3.8 If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.
3.3.9 Seek support for yourself if you are distressed.

3.4 If you are concerned about a pupil's welfare:

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use the concern log to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

3.5 If a pupil discloses to you:

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL. The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupils staff will:

3.5.1 Allow them to speak freely
3.5.2 Remain calm and not overreact
3.5.3 Reassure the child that they are being taken seriously and that they will be supported and kept safe. Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
3.5.4 Not be afraid of silences
3.5.5 Use the TED approach – tell, explain, describe – but avoid asking any leading questions
3.5.6 3.4.6 At an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on and explain to whom and why
3.5.7 Not automatically offer any physical touch as comfort
3.5.8 Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may

be interpreted by the child to mean that they have done something wrong

3.5.9 Tell the pupil what will happen next

3.5.10 Report to the DSL even if the child has promised to do it by themselves

3.5.11 Complete the school's safeguarding concern form and submit to the DSL as soon as possible (the same day), or in their absence, one of the Deputy DSLs.

3.5.12 Seek support if they feel distressed.

3.6 Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved

A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

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

5 days for an in-year transfer, or within

The first 5 days of the start of a new term

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

3.7 Notifying parents

3.5.1 The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure, subject to 8.6.2.

3.5.2 Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

3.7 Concerns about staff

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors, Louise Whitaker (contact details available on request from the school office).

The headteacher/chair of governors will then follow the procedures set out in appendix 1, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

4.0 Roles and Responsibilities

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

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem

4.1 All staff

All staff will:

- Read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education/who are absent from education.
- The early and family help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time

- What to look for to identify children who need help or protection

4.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Lisa Everard , Head of School. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours and for the duration of any breakfast of after-school clubs on the school site for staff to discuss any safeguarding concerns.

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

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

- Keep up to date with all relevant legislation and guidance in relation to safeguarding and child protection, including maintaining a good knowledge and understanding of the local safeguarding context and issues. Communicate this to the rest of the Safeguarding Team and other members of staff where appropriate, and ensure that it is followed in school
- Carry out an annual audit in relation to the school's child protection and safeguarding practices, adapting practice, policy and training where needed, and reporting the findings back to the Local Authority and Safeguarding Governor
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school, and audit these at least annually
- Make sure that staff have appropriate Prevent training and induction
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Referring cases to the LADO where appropriate, then acting as point of contact during any subsequent investigation.

- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Keep detailed written records of any concerns about a child, even if there is no need to make an immediate referral. These include full details of the concern/disclosure, the actions taken and the reasons for any decisions made
- Keep detailed written records of any reported safeguarding concerns about members of staff, including low-level concerns. These include full details of the concern/disclosure, the actions taken and the reasons for any decisions made
- Ensure that all such records are kept confidentially and securely and are separate from pupil records
- Ensure that an indication of further record-keeping is marked on the pupil records
- Ensure that all such records are passed to the next educational setting when a child leaves the school, and that confirmation of receipt is received
- Ensure that any pupil currently the subject of a Child Protection Plan, who is absent without explanation for two days is reported to Children's Social Care
- Monitor attendance for all pupils and ensuring that Local Authority procedures are followed where a child is, or is suspected to be, Missing in Education, as well as taking appropriate action where non-attendance raises, or may indicate, safeguarding concerns
- Liaise with the Virtual School Headteacher for children looked after by the Local Authority and children with a Social Worker, and taking on the role of Designated Teacher for Looked After Children (see also the school's LAC Policy).
- Oversee the Safeguarding Team within the school: ensuring regular and effective communication between all members of the team; ensuring that information related to safeguarding is recorded in a high-quality and timely manner; ensuring that all members of the team receive the training needed to carry out their roles effectively.
- Attend Child Protection Conferences and Core Group Meetings when a child/family is placed on a Child Protection or Child in Need Plan.
- Communicate with the Social Worker re any concerns where a child/family has a Child Protection or Child in Need Plan in place.
- Ensure systems are in place so that all children within the school know how to report abuse and express their views, feel confident in doing this, and are able to do so easily and in a variety of ways.

The full responsibilities of the DSL and deputies are set out in their job description.

4.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

• Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

• Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Make sure:

• The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

• Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

• The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

• The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure

• That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

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

• Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

• Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

• Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).
- All governors will read Keeping Children Safe in Education in its entirety.

4.4 The Executive Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:

• Are informed of our systems that support safeguarding, including this policy, as part of their induction

• Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

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

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable within Early Years
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

4.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

5.0 Confidentiality

5.1 Timely information sharing with regard to safeguarding and child protection is essential.
5.2 We recognise that all matters relating to child protection are confidential.
5.3 The DSL will disclose any information about a pupil to the Executive Headteacher and other members of staff on a need to know basis only.
5.4 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
5.5 All staff must be aware that they cannot promise to a child to keep secrets.
5.6 Data protection laws do not prevent us from sharing information for the purpose of keeping children safe.
5.7 The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

5.8 The DSL should consider that:

Parents or carers should normally be informed (unless this would put the victim at greater risk)

The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

6.0 Prevention and Family/Early Help

6.1 We recognise that the school plays a significant part in the prevention of harm to our pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.

6.2 We also understand that the monitoring of concerns over a period of time can build a fuller picture of potential harm or neglect, and that there does not necessarily need to be a disclosure or allegation for an issue to be considered as abuse.

6.3 The school community will therefore:

- 6.3.1 Ensure and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- 6.3.2 Ensure that all children know there are adults in the school whom they can approach if they are worried or in difficulty.
- 6.3.3 Include in the curriculum opportunities for PSHE and RSE which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
- 6.3.4 Ensure that appropriate support and sign posting is offered to parents and carers.
- 6.3.5 Ensure that referrals are made to Family and Early Help Teams wherever there is a concern which does not meet the threshold for a MASH referral, but which goes beyond the services we are able to offer in school
- 6.3.6 Ensure that all staff know how to make a referral to Enfield Early Help via the Enfield Children's Portal

7.0 Referral to Children's Social Care

7.1 The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made,

unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

7.2 Referrals to Children's Social Care in Enfield are now made through the Enfield Children's Portal: https://cp.childrensportal.enfield.gov.uk/web/portal/pages/home The MASH Team in Enfield can be contacted for advice regarding a referral or child protection concern on 020 8379 5555.

7.3 Where there is a concern about extremism, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

8.0 Children Absent from Education

Attendance, absence and exclusions are closely monitored. A child absent from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children are absent on repeated occasions and/or are missing for periods during the school day.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

9.0 Private Fostering Arrangements

9.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

9.2 Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school should notify the local authority of the circumstances.

10.0 Looked-After and Previously Looked-After Children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

10.2 We have appointed a designated teacher, Lisa Everard - Head of School, alongside our SENCO – Louise Amin who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role

10.3 As part of their role, the designated teacher will:

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

11.0 Child on Child Abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

This is most likely to include (but is not limited to): bullying, including cyberbullying, prejudice-based and discriminatory bullying; physical abuse; sexual violence/harassment; sexting; consensual or non-consensual sharing of nude semi-nude images; causing someone to engage in sexual activity without consent; initiation/hazing rituals.

We have a zero-tolerance approach to child on child abuse and always remain vigilant to this. In relation particularly to sexual violence and sexual harassment, we always take concerns and allegations extremely seriously. We actively teach children about consent as part of our RSE curriculum and whenever opportunities arise so that a culture of respect and safeguarding is cultivated and maintained.

If any pupil needs to report a concern about child-on-child abuse, there are a range of ways in which they can do this, and they are made aware of this through information shared during

Collective Worship, regular reminders in class, and a display in a central location within the school.

11.1 Procedures for dealing with allegations of child on child abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Parents/carers will always be informed where their child has been involved in child on child abuse, either as a victim or a perpetrator.
- Support will always be provided to both victims and perpetrators of child-on-child abuse. This will be coordinated by the DSL.

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

We firmly believe in preventing child on child abuse through our vision and values-led approach. As such, we recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- ✓ Regularly teach about abuse through a range of subjects, including PSHE and RE
- ✓ Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- ✓ Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- ✓ Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ✓ Ensure pupils are able to easily and confidently report abuse using our reporting systems
- ✓ Ensure staff reassure victims that they are being taken seriously
- ✓ Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- ✓ Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- ✓ Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- ✓ Ensure staff are trained to understand:

• How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

• That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

• That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

o Children can show signs or act in ways they hope adults will notice and react to
o A friend may make a report
o A member of staff may overhear a conversation
o A child's behaviour might indicate that something is wrong

• That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

• That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

• The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

• That they should speak to the DSL if they have any concerns

• That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

12.0 Pupils Who Are Lesbian, Gay, Bisexual or Gender Questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or questioning their gender can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.
We also recognise that pupils who are lesbian, gay, or bisexual or questioning their gender are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubescent children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, SEND needs.

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying. We will refer to Department for Education guidance when deciding how to proceed.

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

13.0 Online Safety and the Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
To address this, our school aims to:

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

13.1 The 4 key categories of risk

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

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Please see our Online Safety, AI and Mobile Phone Policies for further information and detail.

14.0 Allegations Against Staff & Volunteers

We understand that a pupil may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher. This includes instances which involve an allegation being made against a temporary, or supply, member of staff.

The Headteacher on all such occasions will discuss the content of the allegation with the LADO, Local Authority Designated Officer for Child Protection and Safeguarding.

If the allegation made to a member of staff concerns the Executive Headteacher, the designated teacher will immediately inform the Chair of Governors, Louise Whitaker, who will consult with the LADO, Local Authority Designated Officer for Child Protection and Safeguarding.

The school will follow the Local Authority procedures for managing allegations against staff, a copy of which can be found in Appendix 1.

15.0 Whistleblowing

15.1 We recognise that children cannot be expected to raise concerns in an environment where the staff fail to do so.

15.2 All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. This should be with the designated teacher, unless their concern is in relation to the designated teacher, in which case they should contact the Safeguarding Governor. All staff are in receipt of the London Borough of Enfield Whistleblowing Policy.

15.3 Alternative routes for Whistleblowing: Staff who feel unable to raise an issue, or feel that their genuine concerns about the effectiveness of safeguarding in the school are not being met, may wish to use the **NSPCC Whistleblowing Helpline 0800 028 0285**.

16.0 Restrictive/Physical Intervention

16.1 Our policy on restrictive and physical intervention by staff is set out in a separate policy and acknowledges that staff must only ever use restrictive intervention as a last resort and that at all times it must be the minimal force necessary to prevent injury to the child and/or another person.

16.2 Any restrictive intervention is usually only undertaken by a member of staff who has undergone appropriate PRICE training.

16.3 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

17.0 Safer Recruitment

17.1 At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

17.2 Our policy on Safer Recruitment can be found in Appendix 3. It follows the LBE Safer Recruitment Guidelines for use by Maintained Schools. It acknowledges that it is essential that all organisations that employ staff or engage volunteers to work with children adopt a consistent and rigorous approach in their recruitment and selection processes with the aim of ensuring that those recruited are suitable for such an important and responsible role. Details can be found in Appendix 3.

18.0 Health and Safety

18.1 Our Health and Safety policy is set out in a separate policy and reflects the consideration we give to the protection of our children both within the school environment and when away from the school when undertaking school trips and visits.

19.0 Teaching About Safeguarding

All pupils are taught about safeguarding in a way which is appropriate to their age and stage of development.

The PSHE curriculum, including RSHE, teaches children about safe relationships. This includes teaching children to recognise and report abusive relationships, understanding consent, and knowing how to access support. This curriculum, which follows the DfE guidance published in July 2025, is adapted for pupils with SEND and the method of delivery is personalised for vulnerable pupils e.g. those who are known to have be victims of abuse.

Within each year group, units on online safety are delivered termly.

Annual NSPCC workshops teach all pupils about different types of abuse and what to do if they are worried about abuse or neglect.

Appendix 1: Definitions and Types of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it. CSE is a form of sexual abuse and can affect any child who has been coerced into engaging in sexual activities. Upskirting is a form of sexual abuse and is also a criminal offence, whereby a picture is taken under a person's clothing without their consent or knowledge with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Domestic abuse can affect children, who can be the victims of the type of abuse through having witnessed this within their own homes, or by experiencing it in their own relationship

Appendix 2: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

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

provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution:

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

Conclusion of a case where the allegation is substantiated

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

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

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

Non-recent allegations

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

Suspicion
Complaint
Disclosure made by a child, parent or other adult within or outside the school
Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

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

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

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct.

Record keeping

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

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

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

References

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

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

Appendix 3: Recruitment and selection process

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

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

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

Advertising
When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken, including an online check of the candidate
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms follow the LDBS agreed format and will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

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

An online search may be conducted as part of due diligence checks on any shortlisted candidates.

Once we have shortlisted candidates, we will ask shortlisted candidates to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

o If they have a criminal history
o Whether they are included on the barred list
o Whether they are prohibited from teaching
o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
o Any relevant overseas information
Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

o For all staff, including teaching positions: criminal records checks for overseas applicants

o For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

Existing staff

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

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

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

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

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act

2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.
All governors will also have a section 128 check.