



# The Grey Coat Hospital

## Safeguarding and Child Protection Policy

|                                 |                                          |
|---------------------------------|------------------------------------------|
| <b>POLICY NAME:</b>             | Safeguarding and Child Protection Policy |
| <b>GOV COMMITTEE:</b>           | Strategy Committee                       |
| <b>LAST POLICY REVIEW DATE:</b> | Sept 2026                                |
| <b>POLICY REVIEW TIMING:</b>    | Annual                                   |

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## Important contacts

| ROLE/ORGANISATION                         | NAME                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | CONTACT DETAILS                                     |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| Designated safeguarding lead (DSL)        | Sandra Young                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 02079691906                                         |
| Deputy DSL                                | Cecily Cole (KS3)<br>Jennifer Morton (KS4)<br>Ian McCartney (KS5)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Extension: 3306<br>Extension:2256<br>Extension:2265 |
| Local authority designated officer (LADO) | <p><b>For LADO consultations and referrals please contact the duty Child Protection Adviser on:</b></p> <p>Telephone: 020 7641 7668<br/>Email: <a href="mailto:LADO@westminster.gov.uk">LADO@westminster.gov.uk</a></p> <p><b>Safeguarding and Child Protection Training, Consultation and Advice for Schools and Education</b></p> <ul style="list-style-type: none"> <li>Aqualma Daniel<br/><b>Email:</b> <a href="mailto:lado@westminster.gov.uk">lado@westminster.gov.uk</a></li> <li><b>Phone:</b> 020 7641 7668<br/>(Duty LADO)</li> </ul> |                                                     |
| Safeguarding Governor                     | Nicola Cottier                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                     |
| Channel helpline                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 020 7340 7264                                       |

### Important local safeguarding contact information

The school must maintain current local referral routes for every borough in which pupils live. For Westminster, the current published route is the Access to Children's Services team on 020 7641 4000 (9am–5pm Monday–Friday) and the Emergency Duty Team on 020 7641 2388 outside those hours. Staff should use the child's home/local authority referral route where the child lives elsewhere and should not delay a referral where there is immediate danger.

## 1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

### Statutory guidance

- The Department for Education's statutory guidance **\*\*Keeping Children Safe in Education (2026)\*\***
- **\*\*Working Together to Safeguard Children (2026)\*\***
- Relevant governance guidance, including the **\*\*current Academy Trust Handbook\*\***
- We comply with this guidance and with the arrangements agreed and published by our three local safeguarding partners.
- This policy is designed for use from 1 September 2026, when KCSIE 2026 comes into force. Until 31 August 2026, KCSIE 2025 remains the statutory version in force. The policy will be reviewed annually and updated sooner where guidance, legislation, local safeguarding arrangements or learning from practice require it.

### Legislation

- The **\*\*Children Act 1989\*\*** and **\*\*Children Act 2004\*\***, which provide 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 the age of 18
- **\*\*Statutory guidance on Female Genital Mutilation\*\***, which sets out responsibilities with regard 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 is meant by 'regulated activity' in relation to children
- **\*\*Statutory guidance on the Prevent duty\*\***, which explains schools' duties under the **\*\*Counter-Terrorism and Security Act 2015\*\*** in relation to protecting people from the risk of radicalisation.
- **\*\*Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025\*\***, as applicable to safeguarding information, privacy and information sharing
- **\*\*Crime and Policing Act 2026\*\***, including changes affecting regulated activity with children from 1 September 2026
- This policy also complies with our funding agreement and articles of association.

### 3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment, **\*\*exploitation\*\***, and **\*\*child-on-child abuse\*\***
- Preventing 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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm or exploitation.

Abuse is a form of maltreatment of a child and may involve inflicting harm, exploitation, or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as *\*sexting\** or *\*youth-produced sexual imagery\**) is the sharing of sexual images or videos by children.

For the purposes of this policy, children includes everyone under the age of 18. Safeguarding and child protection arrangements apply to all children and young people on roll at the school.

#### **Safeguarding Partners**

The following three safeguarding partners are identified in Keeping Children Safe in Education and defined in the Children Act 2004, as amended by the Children and Social Work Act 2017. They are responsible for making arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The **\*\*local authority (LA)\*\***
- The **\*\*Integrated Care Board (ICB)\*\*** for an area within the local authority
- The **\*\*chief officer of police\*\*** for a police area within the local authority area

### 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

## 5. 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 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 5.1 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.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) 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, exploitation and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 16 and Appendix 4 of this policy outline in more detail how staff are supported to do this. All staff, including staff who do not work directly with children, will be provided with and will read Part 1 of KCSIE 2026. The school will not rely on a shortened annex or summary as a substitute for Part 1.

Safeguarding training at induction and subsequent updates will include online safety, including the school's filtering and monitoring arrangements and staff responsibilities for escalating concerns.

Staff will be clear about how to report safeguarding concerns, including concerns about child-on-child abuse and concerns about adults working in or on behalf of the school.

Where appropriate, the school will use the terminology of universal services and community-based Early Help and targeted Family Help, in line with KCSIE 2026 and Working Together to Safeguard Children 2026.

## **5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Sandra Young, Senior Deputy. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Sandra's work mobile number is 07848 028 559. Her email is syoung@gch.org.uk and her extension number is 2206. Her office is based at St. Andrew's on the ground floor.

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

KS3 DSL: Cecily Cole extension 306 mobile: 07903 892 951

KS4 DSL Jennifer Morton extension 256 Mobile 07498 747 187.

KS5 DSL: Ian McCartney (Deputy Head) – extension number 265 and mobile – 07848 028 562

If the DSL and deputies are not available, Susanne Staab (Headteacher) will act as cover (for example, during out-of-hours/out-of-term activities). Her mobile number is 07848 028 553.

The DSL has lead responsibility for safeguarding and child protection, including online safety and understanding the school's filtering and monitoring systems and processes.

The DSL will have clear, reliable and known cover arrangements for periods when they are unavailable, including illness, leave and out-of-hours/out-of-term activities. The school may use a confidential shared safeguarding mailbox or equivalent system where appropriate.

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

- Provide advice and support to other staff on child welfare and child protection matters
- 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, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

## **5.3 The governing board**

The governing board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The governing board has appointed Nicola Cottier to lead and monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

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.

Section 16 of this policy has information on how governors are supported to fulfil their role.

#### **5.4 The headteacher**

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- 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).

## **6. Confidentiality**

There are GDPR and data protection policies in place explaining the school's approach to confidentiality and data sharing. The relevant policies are available on the school's website.

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

Where staff need to share special category personal data, the DPA 2018 includes "safeguarding of children and individuals at risk" as a lawful processing condition. This allows practitioners to share information without consent if:

- it is not possible to gain consent;
- it is not reasonable to expect that consent could be obtained; or
- obtaining consent would place a child at risk.

Staff are aware that they should never promise a child confidentiality regarding a report of abuse, as this may not be in the child's best interests.

The government's Information Sharing Advice for Safeguarding Practitioners (2018) provides seven 'golden rules' for sharing information and supports staff in making decisions about when and how to share information.

Staff who are in any doubt about sharing information should speak to the Designated Safeguarding Lead (DSL) or their deputy for guidance.

## **7. Recognising abuse and taking action**

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

At The Grey Coat Hospital, we have students from a range of London Boroughs. You should contact their home borough to report any concerns you have regarding a child being in danger.

The following link to the GOV.UK webpage contains useful information on reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

### **7.2 If a child makes a disclosure to you**

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

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

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a 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.

Any member of staff who suspects a pupil is *\*at risk\** of FGM or suspects that FGM has been carried out, or discovers that a pupil aged 18 or over appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

The contact details for the Bi-Borough FGM advisor are:

**\*Rochelle-Ann Naidoo\***

Tri-borough Senior Practitioner

Telephone: 020 7641 1610

Email: rnaidoo@westminster.gov.uk

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

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

At The Grey Coat Hospital, we have students from a range of London Boroughs. You should contact their home borough to access details about how to refer to early help.

#### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. This will vary depending on the borough that the concern has been reported to and so it is important to contact the home borough directly and follow their procedures for escalation.

#### **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

## **PREVENT**

### **Kiran Malik**

Prevent Programme Manager, Westminster enquiries only

Telephone: 020 7641 5071

Email: [kmalik@westminster.gov.uk/](mailto:kmalik@westminster.gov.uk/)

### **7.6 If you have a mental health concern**

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

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

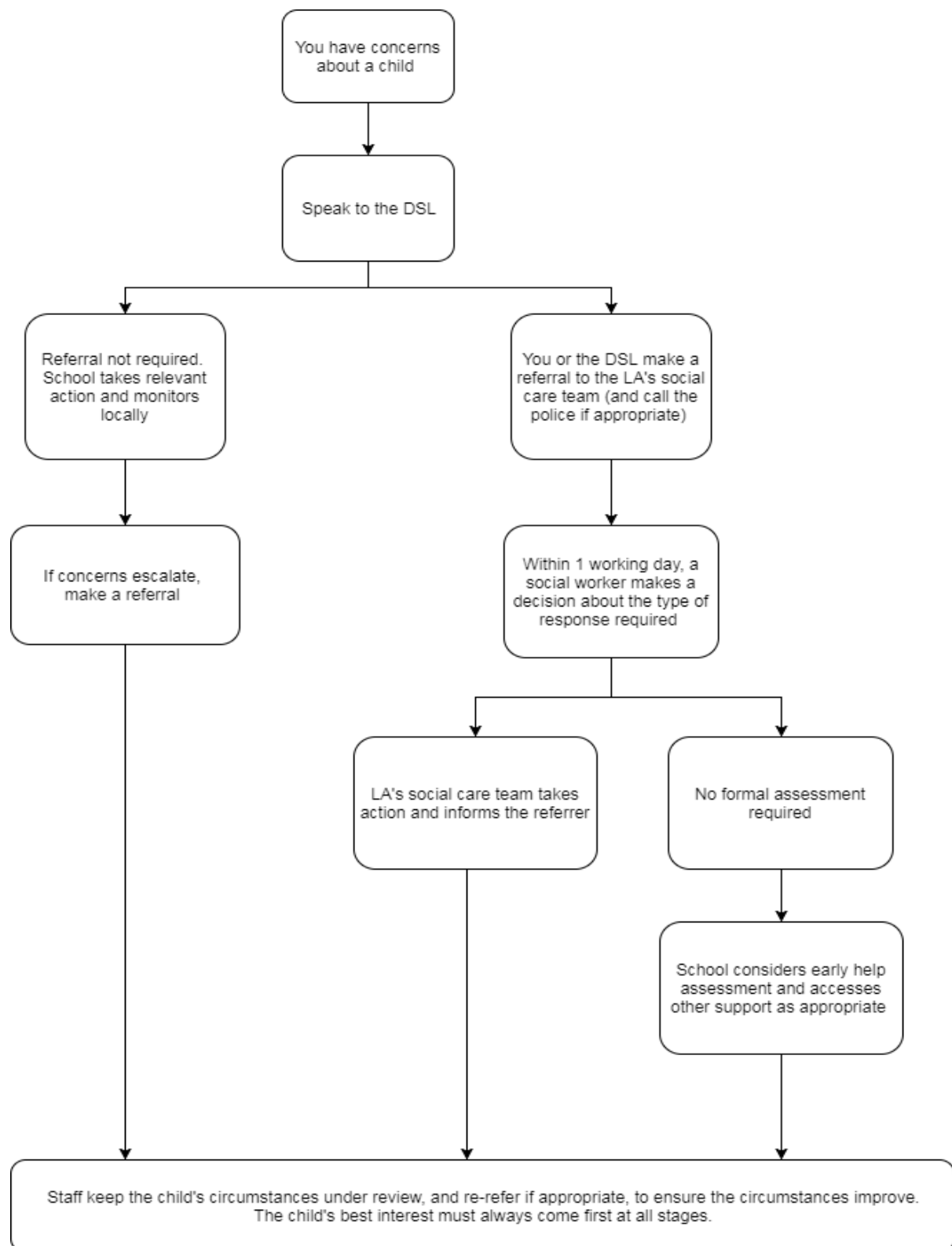
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

The Department for Education guidance on mental health and behaviour in schools also includes more information.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## **7.7 Low-level concerns**

The school promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school, including supply teachers, trainee teachers, volunteers and contractors, are shared responsibly, recorded and dealt with appropriately.

A low-level concern is any concern, however small, that an adult may have acted in a way that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold or is not serious enough to warrant referral to the LADO.

All staff are expected to share low-level concerns with the Headteacher or the person nominated in the Staff Code of Conduct. Concerns will be recorded, handled sensitively and proportionately, and reviewed for patterns. Where there is doubt about whether a concern meets the harm threshold, the school will consult the LADO.

The school's Staff Code of Conduct sets out the detailed process for reporting and managing low-level concerns, allegations against staff and whistleblowing.

## **7.8 Concerns about a staff member, supply teacher, trainee teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

## **7.9 Child-on-child abuse (including harassment and violence)**

We recognise that children are capable of abusing other children, including online, and that child-on-child abuse can occur inside and outside school. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

For some, but not all, forms of child-on-child abuse, girls may be more likely to be victims and boys more likely to be perpetrators. This does not apply to all forms of abuse and all child-on-child abuse is unacceptable and will be taken seriously. The school will challenge misogyny, misandry and other derogatory, discriminatory or sexualised behaviour.

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 sexting)

\*

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
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by signposting regularly in form time and assemblies where they can go to ask for help or who they can talk to.
- Ensuring staff are trained to understand 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

#### **7.10 Making or sharing nudes and semi-nudes, including where generated by AI**

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

##### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving making or sharing nudes or semi-nudes, including images or videos generated or altered using AI, you must report it to the DSL immediately.

You must not:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

##### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)

- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

#### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

#### **Informing parents**

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

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting our safer schools officer and/or dialling 101.

#### **Recording incidents**

All incidents involving the making or sharing of nudes or semi-nudes and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents involving the making or sharing of nudes or semi-nudes.

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our PSHE education and ICT programmes of study. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **8. Notifying parents**

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **9. Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

- Self-Development Programmes.
- Individual Learning Mentor Support
- Individual Speech and Language Therapy

- Individual work with the MIND Practitioners based at the school
- Referrals to the Senior School Nurse and individual support from the Senior School Nurse
- Individual Counselling/Psychotherapy from the School Counsellor (Rachel Bloggs)

## 10. Pupils with a social worker

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

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

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

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

## 11. Looked-after and previously looked-after children

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

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

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

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

As part of their role, the designated teacher will:

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

We have appointed an appropriately trained teacher, Sandra Young, to take the lead on promoting the educational achievement of looked-after and previously looked-after children, alongside the child's Head of Year.

As part of their role, they will:

- Work closely with the deputy DSLs to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

## 12. Gender-questioning children and safeguarding

The school will safeguard and promote the welfare of every child, including children who are questioning their gender. Any decision about support will be made on an individual, case-by-case basis, with the best interests, safety, wellbeing and dignity of the child at the centre. The school will consider the views and wishes of the child and the views of parents/carers, unless there is a genuine safeguarding reason not to involve them, and will consider any relevant clinical advice available to the family.

Requests relating to social transition, including changes to names, pronouns or uniform, will be considered carefully in light of safeguarding duties, the Equality Act 2010 and the Human Rights Act 1998. The school will not adopt a one-size-fits-all approach.

The school will maintain accurate records, including the child's biological sex, where required for safeguarding and the lawful operation of the school. Records will be handled in accordance with applicable data protection law.

### Use of pronouns in school correspondence

In formal school letters and written correspondence, the school will normally use the gender-neutral term 'child' rather than gendered pronouns such as 'he' or 'she', where this is appropriate and consistent with the purpose of the communication. This does not prevent the school from recording or using legally or operationally necessary information, including the child's biological sex, where required for safeguarding or other lawful purposes.

### Single-sex facilities and sport

The school will comply with the safeguarding and legal requirements in KCSIE 2026 concerning toilets, changing rooms, showers, sport and overnight accommodation. Alternative facilities may be considered for a gender-questioning child who does not wish to use facilities designated for their biological sex, provided that this does not compromise the provision of single-sex facilities or the safety, comfort, privacy or dignity of any child. Relevant decisions will be recorded and reviewed.

Where sport needs to be played in single-sex groups from a certain age to ensure children's safety, the school will apply the KCSIE 2026 position and will not make exceptions. Where safety is not the determining factor, requests relating to participation will be considered in accordance with the school's policies and the relevant KCSIE 2026 guidance.

## 13. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow applicable data protection laws when taking and storing photos and recordings for use in the school.

Further details about our school's policy on using mobile phones and cameras, including taking, using and storing photos are found in our IT, Acceptable Use and Confidentiality protocols which all staff sign up to before being given access to school devices or a school email address. Reference is also made in our Data Protection and Privacy Policy.

## **14. Complaints and concerns about school safeguarding policies**

### **14.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### **14.2 Other complaints**

The Staff Code of Conduct and disciplinary policy prescribes how allegations or complaints by, or about staff, will be dealt with.

### **14.3 Whistle-blowing**

The school has a separate whistle-blowing policy. The aims of the policy are outlined below:

#### **1. Aims**

The policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all staff and students know how to raise concerns about potential wrongdoing in or by the academy
- Set clear procedures for how the academy will respond to such concerns
- Let all staff and students know the protection available to them if they raise a whistle-blowing concern
- Assure staff and students that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

## **15. Record-keeping**

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

All safeguarding concerns, discussions and decisions, including the reasons for decisions, must be recorded in writing or digitally. Records should be clear and factual and distinguish, where relevant, between observed concerns, professional opinion and historic information. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily 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 and within 5 days for an in-year transfer or within the first 5 days of the start of a new term, securely and separately from the main pupil file. Confirmation of receipt should be obtained. 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.

Record-keeping arrangements:

- Safeguarding information on students in the school is stored using the software package Edukey. It is a secure system which allows staff members to log safeguarding concerns. The system is also used to record other safeguarding information. Access to records is limited to HoYs and SLT. However all staff members can log a report/incident in Edukey using a password.
- Paper records received externally are scanned into Edukey. Safeguarding files from other schools are stored securely in a locked area of the school. Access is granted to the DSL. The school encourages agencies to encrypt all sensitive information sent about a child. Staff at The Grey Coat Hospital are instructed to use the initial of students in communication to safeguard identity.
- Safeguarding records are retained, reviewed and disposed of in accordance with the school's records retention schedule and applicable data protection law.
- The keeping of records is in line with the school's Data Protection and Privacy Policy

The school does share information with outside agencies. Any information shared is deemed as confidential and complies with the school's Data Protection and Privacy Policy. The school will send password protected documents or use secure software such as Egress to forward information.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff
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## 16. Training

### 16.1 All staff

All staff members, including those who do not work directly with children, will undertake safeguarding and child protection training at induction, including online safety and the school's filtering and monitoring arrangements, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse, neglect or exploitation. This training will be regularly updated and will be in line with advice from the safeguarding partners.

All staff will have training and updates on the Prevent duty, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **16.2 The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

### **16.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

### **16.4 Recruitment – interview panels**

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

## **17. Monitoring arrangements**

This policy will be reviewed annually by the Designated Safeguard Lead. At every review, it will be approved by the full governing board.

### **18. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Gender-questioning children / equality arrangements
- Sex and relationship education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
-

## 18. Other related policies:

- Whistle blowing policy
- Data Protection and Privacy Policy
- ICT agreement staff and students
- Well-being Policy
- SEND Policy

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

## Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

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

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

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

Once a child is born, neglect may involve a parent or carer failing to:

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

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

## Appendix 2: safer recruitment and DBS checks – policy and procedures

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

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- 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, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

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

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- 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.

### **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.

### **Volunteers**

We will:

- Submit volunteers engaging in regulated activity with children to the appropriate DBS checks. The removal of the supervision exemption from 1 September 2026 will be taken into account when determining whether a volunteer is 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

### **Governors**

All trustees, local governors and members will have an enhanced DBS check without barred list information.

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

The chair of the board will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise pupils on work experience**

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

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. Schools cannot require a work-experience provider to obtain an enhanced DBS check with children's barred list information for staff supervising children aged 16 or 17. The school will undertake the risk assessment and checks required by current KCSIE 2026 and DBS guidance, taking account of the nature of the placement, supervision and the age of the child.

### **Pupils staying with host families**

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

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

## Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

### **Suspension of the accused until the case is resolved**

Suspension 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 it 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 have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust.

### **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
- **\*\*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 headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *\*before\** consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **\*\*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. Additional support is available to individuals from colleagues, if applicable a trade union representative, referral to the school’s occupational health team, and for those members of staff who have signed up to the free Simply Health cash plan, free counselling.
- 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 and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 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 academy trust 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 staff**

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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**

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

## **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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer 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 or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

### **Confidentiality**

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 local authority's designated officer, 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. Such records will include:

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

We will retain records in accordance with our records retention schedule and applicable data protection law. Records relating to allegations against staff will be retained in accordance with KCSIE 2026 and the school's records retention arrangements; records will be retained at least until the individual has reached normal pension age or for 10 years from the date of the allegation, whichever is longer, except where a longer period is required by law or the school's records retention schedule. 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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

After any cases where the allegations are \*substantiated\*, we 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

## Appendix 4: specific safeguarding issues

### Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

### Child criminal exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

### **Child sexual exploitation**

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

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

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

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

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

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

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

### **Domestic abuse**

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

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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.

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

### **Homelessness**

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

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

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

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

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

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

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

### **FGM**

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs
- 

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

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

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmfco.gov.uk](mailto:fmfco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

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

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

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

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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

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

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

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

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

Staff should always take action if they are worried.

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

### **Modern slavery and trafficking**

Children may be victims of modern slavery or trafficking, including through criminal or sexual exploitation. Staff will remain alert to indicators such as coercion, control, unexplained travel, missing episodes, debt, threats, injuries, unexplained possessions, or being required to carry out criminal activity. Concerns will be referred to the DSL and managed under local safeguarding procedures. Where appropriate, the school will seek specialist advice and make referrals to children's social care and/or the police.

### **Children requiring mental health support**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The school will provide appropriate support and will consider whether a mental health concern is also a safeguarding concern. Staff will be alert to changes in behaviour, emotional distress, self-harm and suicidal thoughts or behaviour. Where there is a safeguarding concern, staff will follow the safeguarding referral process without delay.

### **Serious violence**

Staff will be alert to indicators that a child may be at risk from or involved in serious violence, including changes in friendships, unexplained injuries or possessions, absences, declining attendance, changes in behaviour, involvement in gangs or county lines, carrying weapons or increased vulnerability to exploitation. Concerns will be shared with the DSL and managed through local safeguarding procedures.

### **Private fostering**

Where staff become aware that a child under 16 (or under 18 if the child has a disability) is being cared for and accommodated for 28 days or more by someone who is not a parent, person with parental responsibility or relative, the school will notify the local authority in accordance with statutory requirements and local procedures.

### **Children with family members in prison or affected by parental offending**

The school will recognise that parental imprisonment or offending can create additional safeguarding and welfare needs. The DSL will consider the child's individual circumstances and coordinate appropriate pastoral, educational and safeguarding support.

### **Young carers and children with additional health needs**

The school will consider the additional safeguarding and welfare needs of young carers and children with relevant health conditions. Staff will take account of how these circumstances may affect attendance, learning, wellbeing and the child's ability to recognise or disclose abuse.

### **Violence against women and girls, misogyny and misandry**

The school recognises that violence and abuse can be gendered and will challenge misogyny, misandry, sexual harassment, sexual violence, discriminatory behaviour and other harmful attitudes. These issues may occur face to face or online and may form part of child-on-child abuse or abusive intimate relationships.

### **Online safety, filtering and monitoring**

The school will maintain appropriate filtering and monitoring systems and will review their effectiveness at least annually. The review will be led by the SLT member responsible for filtering and monitoring, supported by the DSL and IT staff, and will include checks across internet-connected devices and relevant locations. Records of reviews and identified actions will be maintained. Staff will know how to escalate concerns arising from filtering or monitoring.

### **Generative artificial intelligence**

The school will recognise that generative AI can create or facilitate safeguarding risks, including manipulated or wholly AI-generated sexual images, misinformation, grooming, harassment and other harmful content. Staff and pupils will be taught about safe and responsible use of AI, and any safeguarding concern involving AI-generated or manipulated content will be referred to the DSL.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff.

All visitors will comply with the school's current visitor management, safeguarding and site-security arrangements. Any additional risk assessment will be completed where the nature of the visit requires it.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors are issued with the school's Safeguarding Guidance.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

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

the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

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

**Non-collection of children**

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

Contact parents/carers in the first instance and then contact other named persons on the school's system. A member of SLT, HoY and site staff will remain on site until a named person on the school system collects the child.

**Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will

Follow procedures outlined in the attendance policy including contacting the police.