Safeguarding (Child Protection)

Policy and Procedures

Academic Year 2025-2026

Review Date: August 2026

Aims and Principles

St Paul's Cathedral School is a Christian, co-educational community which holds to the values of love, justice, tolerance, respect, honesty, service and trust in its life and practice, to promote positive relationships throughout the school community and where the safety, welfare and emotional well-being of each child is of the utmost importance.

The school aims to instil a love of learning through a broad curriculum. It aims to give each pupil the opportunity to develop intellectually, socially, personally, physically, culturally and spiritually. All pupils are encouraged to work to the best of their ability and to achieve standards of excellence in all of their endeavours.

Through the corporate life of the school, and through good pastoral care, the school encourages the independence of the individual as well as mutual responsibility. It aims to make its pupils aware of the wider community, espouses the democratic process and encourages a close working relationship with parents and guardians.

Contents

1. Policy statement and principles
   1.1 Child protection statement
   1.1 a) Policy principles
   1.1 b) Policy aims
2. Safeguarding legislation and guidance
3. Roles and responsibilities
   3.1 The Designated Safeguarding Lead (DSL)
   3.2 The Deputy Designated Safeguarding Leads (DDSL)
   3.3 The Governing Body
4. Good practice guideline and staff code of conduct
5. Abuse of position of trust
6. Children who may be particularly vulnerable
7. Children with special educations needs and disabilities
8. Children who are absent from education
9. Mental health
10. Children who are lesbian, gay, bisexual, or gender questioning
11. Whistleblowing if you have a concern about a colleague
12. Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers
    12.1 Procedure for dealing with allegations made against staff
        12.1.1 Low Level Concerns
13. Staff and Governor training
14. Safer recruitment
    14.1 Volunteers
    14.2 Contractors
15. Site security
16. Extended school and off-site arrangements
17. Staff/pupil online relationships
18. Child protection procedures
    18.1 Recognising abuse
    18.2 Bullying
    18.3 Taking Action
    18.4 If you are concerned about a pupil's welfare
    18.5 If a pupil discloses to you
    18.6 Notifying parents
19. Confidentiality and sharing information
20. Referral to children's social care
21. Reporting directly to child protection agencies
22. Child-on-child abuse
    22.1 Minimising risk
    22.2 Managing allegations of child-on-child abuse and supporting those involved
23. Serious violence
24. Child criminal exploitation (CCE) and child sexual exploitation (CSE))
    24.1 Child sexual exploitation (CSE)
    24.2 Child criminal exploitation (CCE)
    24.3 County lines
25. Online safety
26. Sharing nudes and semi-nudes
27. Domestic Abuse
28. Honour-based abuse
29. Radicalisation and extremism
30. Private fostering arrangements

31. Special circumstances
    31.1 Children who have a social worker
    31.2 Boarding schools
    31.3 Looked after children

Appendix One
Four categories of abuse
    Physical abuse
    Emotional abuse
    Sexual abuse
    Neglect
Indicators of abuse

Appendix Two
Record of Concern form

Appendix Three
Low Level Concerns Form

Reviewed by:

Designated Safeguarding Lead : Caroline Heylen
Date: September 2025

Head : Judith Fremont-Barnes
Date: September 2025

Governor with responsibility for safeguarding: Paula Jefferson
Date: September 2025

1. Policy statement and principles

This is the safeguarding (child protection) policy and procedures of St Paul's Cathedral School (**school**) This policy applies to all sections of the school including boarding and EYFS and applies at all times including where pupils or staff are away from school, whether they are on school-arranged activities or otherwise, and whether or not the school is open. It will therefore apply to out of school hours and in the holidays

This policy should be read in conjunction with a series of policies in the school's integrated safeguarding portfolio:

- Anti-bullying policy
- Educational Visits Policy
- Acceptable Use of ICT Policy (Pupils)
- Acceptable Use of ICT Policy (Staff)
- Online Safety Policy
- Staff code of conduct and Whistleblowing Policy
- Recruitment, Selection and Disclosure Policy
- St Paul's Cathedral Safeguarding Policy
- RSE Policy
- Missing Pupil Policy
- EYFS Policy on the use of cameras, mobile phones and electronic devices
- First Aid Policy
- Learning Support Policy
- Health and Safety Policy
- Data Protection and Privacy Policy
- Safe Restraint Policy
- Complaints Policy
- Attendance Policy
- AI Policy
- Behaviour Policy including Use of Reasonable Force, Search and Confiscation Policies, and Mobile Phone and Devices.
- Supervision Policy

This policy is available on the school website and is available in hard copy on request. The policy can be made available in large print or other accessible format if required. All staff are required to read and confirm they have read the updated policy at least annually.

Our core safeguarding principles are:

- Safeguarding is everyone's responsibility
- The school's responsibility to safeguard and promote the welfare of children is of paramount importance
- Safer children make more successful learners
- Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

1.1 Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and Governors and are consistent with those established by the City and Hackney Safeguarding Children's Partnership (CHSCP) as set out in the City of London Threshold of Needs Document The City of London Corporation Thresholds of Need

1.1 a) Policy principles

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection and should feel safe and protected from any form of abuse, neglect and exploitation
- All staff have an equal responsibility to understand the indicators of abuse, neglect and exploitation and understand specific safeguarding risks so they can identify them, act on and report any concern, suspicion or disclosure that may suggest a child is at risk of harm.
- All staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- Pupils and staff involved in child protection issues will receive appropriate support, including anyone about whom a concern is raised where the matter will be handled sensitively and appropriate action will be taken.
- Members of the school community (to include alumni) should feel able to raise safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.
- This policy forms part of the school's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the school to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.

1.1 b) Policy aims

- To actively promote the well-being of pupils.
- To safeguard and promote the welfare of children, staff and others who come into contact with the school and to protect them from harm
- To have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation.
- To raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good safeguarding practice throughout the school, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it.
- To demonstrate the school's commitment regarding child protection to pupils, parents and other partners.
- To promote a whole school culture of safety, equality and protection.

Terminology

Safeguarding and promoting the welfare of children refers to the process of providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care; promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children and taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity who work directly with children.

Maintenance Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in a paid capacity who do not work directly with children.

DSL refers to the designated safeguarding lead at the school. References to the DSL include the Deputy DSL (DDSL) where the DSL is unavailable.

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

2. Safeguarding legislation and guidance

The school is mindful of the legislation and guidance which is designed to safeguard the welfare of children and the following legislation and guidance has been considered when drafting this policy:

- The Children Act 1989
- Children Act 2004
- Working Together to Safeguard Children (December 2023)
- Keeping Children Safe in Education (September 2025)

- EYFS framework for group and school-based providers (effective from 1 September 2025)
- London Child Protection Procedures 2025 (City and Hackney Safeguarding Children Partnership)
- National Minimum Standards for Boarding schools (updated 2022)
- Education (Independent School Standards) (England) Regulations 2014
- Disqualification under the Childcare Act (Updated August 2018)
- Disqualification by Association (September 2018)
- What to do if you are worried a child is being abused (March 2015)
- Prevent Duty Guidance: for England and Wales (December 2023)
- Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023, updated December 2023)
- Relationship Education, Relationship and Sex Education (RSE) and Health Education Guidance (2021)
- The Safeguarding Vulnerable Groups Act 2006
- Childcare Act 2006
- Equality Act 2010
- The Teacher Standards 2012
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024)
- Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);
- Children missing education (DfE, August 2024)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people 2020
- Working Together to improve School Attendance (August 2024)

3. Roles and responsibilities

Safeguarding Contact Information

Head	Judith Fremont Barnes Head@spcs.london.sch.uk 020 7248 5156, Mobile: 07394 805361
Designated Safeguarding Lead (DSL)	Caroline Heylen (Deputy Head) cheylen@spcs.london.sch.uk 020 7651 0283, Mobile: 07394 805362
Deputy Designated Safeguarding Lead (DDSL) (Boarding Focus)	Joe Gorman (Head of Boarding) jgorman@spcs.london.sch.uk 020 7651 0291. Mobile: 07394 805364
Deputy Designated Safeguarding Lead (DDSL) (with responsibility for the EYFS)	Kim Thomas (Head of Pre-Prep) Kthomas@spcs.london.sch.uk Mobile: 07394 805365
Deputy Designated Safeguarding Lead (DDSL)	Julie Schindler (Head of English and Year 5/6 Co-Ordinator) jschindler@spcs.london.sch.uk
Governor with Safeguarding Responsibility	Paula Jefferson pjefferson@spcs.london.sch.uk
Chair of Governors	Canon Dr Paula Gooder chair@spcs.london.sch.uk

Local Authority Designated Officer (LADO) and City of London's Local Authority Designated Officer	Laura Demetriades laura.demetriades@cityoflondon.gov.uk 020 7332 1215
Prevent and Channel Officer	Claire Doyle Claire.Doyle@cityoflondon.gov.uk prevent@cityoflondon.gov.uk 020 7601 2442
City and Hackney Safeguarding Children Partnership (CHSCP)	City of London: 020 7332 3621 Hackney: 020 8356 5500 CHSCP Independent Child Safeguarding Commissioner: Jim Gamble
City of London Children and Families Team (Social Care)	Dccsdutyf&ypteam@cityoflondon.gov.uk 0207332 3621/020 8356 2710 (out of hours emergencies)
DfE Counter-extremism hotline	Counter-extremism@education.gsi.gov.uk 0800 789 321 / 020 7340 724

3.1 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the school. The DSL is a senior member of staff on the school's leadership team and has the status and authority within the school to carry out the duties of the post, which include:

• ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publicly available

• advising and supporting staff on child protection and safeguarding matters

• encouraging a culture of listening to children

• managing safeguarding referrals to City of London children's social care, the Police, or other agencies

• liaising with the Head regarding ongoing enquiries under section 47 of the Children Act 1989 and Police investigations and being aware of the requirement for children to have an appropriate adult in relevant circumstances

• taking part in strategy discussions and inter-agency meetings

• liaising with the "case manager" and the Designated Officer(s) at the Local Authority where allegations are made against staff

• making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements

• transferring the child protection file to a child's new school

• undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training. Completing Level 3 safeguarding at least every two years

• ensuring that all staff including EYFS staff and the Head have annual training to assure competence in child protection matters including 'Prevent' awareness, and online safety training, and to keep records detailing such training

• ensuring that when KCSIE updates are released that all staff read and understand Part 1 and Annex B

• ensuring that when KCSIE updates are released that all maintenance staff read and understand Annex A

• ensuring that temporary and voluntary staff who work with children are made aware of the school's child protection arrangements

• keeping written records of all concerns in respect of child protection in a locked location

• notifying City of London Children's Services Team of any unexplained absence of more than two days for any child who is subject to a child protection plan

• making an annual child protection report to the Governing Body in consultation with the Designated Governor for child protection

• liaising closely with the cathedral staff responsible for rehearsals and performances with the choristers and probationers to safeguard their general well-being.

• liaising with the Head to inform of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult present. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE Code C and any other code of practice apply.

3.2 The Deputy Designated Safeguarding Leads (DDSLs)

Are trained to the same level as the DSL and support the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL one of the deputies will assume the functions above.

The DSL or DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstance the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care.

3.3 The Governing Body

The Governing Body is accountable for ensuring that the school has effective policies and procedures in accordance with legislation and guidance, and is accountable for monitoring the school's compliance. All members of the Governing Body have undergone DBS checks and complete safeguarding training.

The Governing Body will ensure that:

- the school has a child protection policy and procedures in place, in line with current legislation and guidance, is in accordance with locally agreed inter-agency procedures and follows the guidelines of the City and Hackney Safeguarding Children Partnership
- there is a Designated Governor for child protection
- the school has a senior member of the leadership team, who is the Designated Safeguarding Lead (DSL) for child protection, who has undertaken basic and further training, including refresher training every two years
- all staff know the name of the senior person responsible for child protection and are aware of that person's role
- there is a job description for the DSL and that he or she has sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively
- all staff (including temporary staff, senior boarders and volunteers) are made aware of the school's arrangements for child protection, and their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the designated senior person responsible for child protection
- mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of KCSIE
- ensure that all maintenance staff who do not work directly with children read Annex A (a condensed version of KCSIE)
- written records of concerns about children are kept securely, away from the main pupil file in a locked location and that such records are kept even if there is no need to refer the matter immediately
- the School always follows safe recruitment procedures, including DBS checks. There are procedures for dealing with low level concerns and allegations against a member of staff, volunteers or the Head in line with locally agreed inter-agency procedures (in line with the City and Hackney Safeguarding Children Partnership's requirements)
- staff and the Head have undertaken appropriate training to assure their competent execution of their child protection responsibilities (updated at least every 2 years) and receive safeguarding updates at least annually
- it has considered how children may be taught about safeguarding, including online, through the curriculum and PSHE and provision is made for teaching children to keep themselves safe
- children are safeguarded from potentially harmful and inappropriate online material by ensuring appropriate filters and monitoring systems are in place (see Annex C of KCSIE)
- parents have an understanding of the responsibility for child protection placed on the staff and school
- it recognises the importance of information sharing between professionals and local agencies and that the school develops effective links with the relevant agencies and co-operates as required with their enquiries regarding child protection matters in line with locally-agreed inter-agency procedures
- when the School is hiring or renting out School facilities/premises to organisations or individuals (for example community groups) it checks that the service providers have appropriate arrangements in place to keep children safe.

The Governing Body will:

- review the School's child protection policies annually, including an update and review of the effectiveness of procedures and their implementation
- receive a report at least annually (in June) and as required from the DSL
- remedy any deficiencies or weaknesses in the School's arrangements for child protection without delay.

- nominate a member of the Governing Body (usually the Chair) to liaise with relevant agencies in the event of an allegation against the Head Teacher or the DSL for child protection
- review its child protection policy and procedures annually and maintain information about them and the efficiency with which the above duties have been discharged.

4. Good Practice Guideline and Staff Code of Conduct

The Head is responsible for overall management of the School and for the management of concerns and allegations about staff. The Head ensures that the policies and procedures of the School, adopted by the Governing Body (particularly those concerning referrals of cases of suspected abuse and neglect) are understood and followed by all staff.

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff code of conduct and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to the Police or children's social care

The School's staff code of conduct sets out our expectations of staff in full and is read and signed by all staff annually.

5. Abuse of Position of Trust

All School staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

6. Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our pupils receive equal protection, we will give special consideration to children who are:

- part of the chorister programme.
- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic violence or parental mental health needs
- vulnerable to being bullied, or engaging in bullying
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- do not have English as a first language
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

7. Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing and signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff are supported by the learning support team to manage these additional barriers to ensure this group of children are appropriately safeguarded.

8. Children who are absent from education

Attendance, absence and exclusions are closely monitored. Please see the School's Attendance policy for more information in this regard. A child being absent from education for prolonged periods and/or on repeat occasions, and a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor unauthorised and unexplained absence and take appropriate action including notifying the local authority, particularly where children are absent or go missing on repeated occasions and/or are missing for periods during the school day. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

9. Mental Health

Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

Only appropriately trained health professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. The school has a Mental Health Lead, Counsellor and trained Mental Health First Aiders who can support both staff and pupils.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a Deputy.

The Department of Education has published advice and guidance on Promoting mental well-being and support in schools.

https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges

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

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBT, or are perceived to be LGBT, can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff endeavour to reduce barriers and provide a safe space for those children to speak out or share their concerns with them.

Revised government guidance on gender questioning children is expected 'soon' as stated in KCSIE 2025. See also the school's policy on Gender Questioning Pupils.

11. Whistleblowing if you have a concern about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistleblowing procedures enable staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head. Complaints about the Head should be reported to the Chair of Governors.

Staff may also report their concerns directly to children's social care or the Police if they believe direct reporting is necessary to secure action.

12. Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers

When a safeguarding concern or allegation is made about a member of staff, including supply staff, contractors or volunteers, or relates to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children, our set procedures must

be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff can be found in *Keeping Children Safe in Education (DfE, 2025).*

Safeguarding concerns or allegations made about staff who no longer work at the school, or historical allegations will be reported to the Police.

12.1 Procedure for dealing with allegations made against staff

Part 4 of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers and contractors, who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

- Concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and
- Allegations that may meet the harm threshold.

Any allegation against a member of staff, supply teacher, volunteer, a member of the Cathedral community or the Designated Person must be reported to the Head who will refer on to the Local Authority Designated Officer (LADO).

If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors *without* notifying the Head first.

The London Child Protection Procedures apply if there is an allegation of concern that any person who works with children in connection with their employment or voluntary activity has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against a child
- behaved towards a child or children in a way that indicates they are unsuitable to work with children.

In case of serious harm, or on suspicion that a crime may have been committed, the Police should be informed from the outset.

A staff member may be suspended until the matter has been fully investigated, although such suspension is not automatic. Suspension is a neutral act and the suspension will be on full pay. If an allegation is made against the Head or the Designated Person, the Designated Governor and Chair of Governors will become involved.

The School is bound by a requirement to notify the Disclosure and Barring Service (DBS) if any person (whether employed, contracted, a volunteer or student) has applied for a position at the School despite being barred from working with children and / or has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed because they have satisfied the harm test (as defined in section 35 of the Safeguarding Vulnerable Groups Act 2006), have committed relevant conduct (as defined in schedule 3 to the Safeguarding Vulnerable Groups Act 2006) or has been cautioned for, or convicted of, a relevant offence (as defined in paragraphs 1 and 2 of schedule 1 to the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Relevant Offence) Regulations 2009)..; the

DBS address for referrals is: P.O. Box 181, Darlington DL1 9FA (tel: 01325 953795) This requirement remains if a member of staff resigns before the completion of a disciplinary investigation but in the event that a determination to dismiss would have been the likely outcome.

The School is under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where the school has ceased to use the services of because the teacher has been dismissed for serious or gross misconduct and a prohibition order may be appropriate. This requirement remains if a member of staff resigns before the completion of a disciplinary investigation but in the event that a determination to dismiss would have been the likely outcome.

Members of staff should be aware of their vulnerability and should do their utmost to prevent misunderstanding. All staff, residential and non-residential, should be familiar with the School's Code of Conduct guidelines for managing staff/pupil relationships. This is particularly important for staff accompanying residential trips.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether any improvements to be made to the School's procedures or practice to help prevent any similar events in the future.

12.1.1 Low Level Concerns

A Low-Level Concern is any concern – no matter how small, even if no more than a 'nagging doubt' – that any member of staff may have acted in a manner which:

- does not meet the allegations threshold or is not considered serious enough to refer to the Local Authority Designated Officer (LADO)
- is not consistent with an organisation's Code of Conduct and values
- undermines trust in expected behaviours
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- shouting at children
- using inappropriate, sexualized, intimidating or offensive language

To help prevent low-level concerns (LLC), staff codes of conduct, behaviour policies and safeguarding policies and procedures should be implemented effectively and appropriate action should be taken to deal with any concern.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Safeguarding Lead or Head.

Low-level concerns at the School should be reported to the Head or the DSL. The Safeguarding Lead should share the low-level concern immediately with the Head. If there are concerns about this DSL, these should be reported to the Head. If the concern is about the Head it should be shared with the Chair of Governors.

The School aims to create an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards.

Low-level concerns can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

The Head keeps a written record of concerns. Records should include the details of the concern, how the concern arose and the actions taken. Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken.

When reviewing patterns of behaviour the School must consider if any wider cultural issues in School contributed to or enabled the behaviour to occur and if so whether further training or a revision of policies is required.

13. Staff and Governor Training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation. Training will include Prevent and online safety (including an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) and to know what to do if they have a concern.

New staff receive a briefing during their induction which includes:

- the School's child protection policy
- the School's good behaviour policy for pupils and anti-bullying policy
- the staff behaviour policy and code of conduct including the whistleblowing procedure
- the identity of the DSL and DDSLs
- a copy of Part 1 of KCSIE including Annex B
- Prevent Training
- Online Safety Training

All staff including the DSL, Head and Governors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

Staff in the School's early years setting will receive training in accordance with Annex C of the *EYFS statutory framework for group and school-based providers* (DfE, September 2025) and will be supported and confident to implement the setting's safeguarding policy and procedures on an ongoing basis. Training will be renewed every two years and the School will consider whether any staff need to undertake annual refresher training during any two-year period to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting.

Our Governors receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test

and assure themselves that there is an effective whole school approach to safeguarding. This training is updated at least annually.

Our Governor with responsibility for safeguarding receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding throughout the school. As part of that training the Governor with responsibility for safeguarding will be expected to ready the entirety of KCSIE. All other governors will be expected to read Part 2 of KCSIE.

The School maintains written records of all staff and governor training.

14. Teaching pupils about safeguarding

The School teaches pupils about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help. The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

15. Safer recruitment

The School complies with the requirements of Keeping Children Safe in Education (DfE 2025) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. Please see the School's separate Recruitment, Selection and Disclosure policy for further details.

The School recognises that a structured approach to recruitment, which includes appointing staff to specific job roles which have a job description, is an important part of ensuring safe recruitment.

Job descriptions are provided which include reference to procedures relating to the protection of children, the duty to prevent child abuse, and the action to be taken if abuse is discovered or disclosed; they also set out clearly to whom members of staff are accountable and those whose work they are responsible for supervising as well as the name and role of the Designated Safeguarding Lead in the school.

During the interview process interviewees will be asked specifically about their experience of work with children.

Before appointment of the individual to a post the School will:

- obtain two references from persons who have experience of the applicant's paid or voluntary work with children and have specifically addressed this topic in giving a reference
- make no appointment prior to receipt of a satisfactory Enhanced DBS check
- make no appointment prior to checking prohibition from teaching orders if the individual is to carry out teaching work

- make no appointment prior to checking prohibition from management directions if the individual is to be appointed to a management position

The School will make a barred list check and an overseas check if applicable.

The School has registered with an agency (Atlantic Data) so that it can access the Disclosure service in relation to all paid staff (full, part time and temporary) and volunteers who have regular unsupervised access to children. All School staff must have a DBS check. Disclosure arrangements for the School are managed by the Head of HR and Compliance. Disclosure information is kept securely by the Head of HR and Compliance.

As part of the Disclosure process, the Bursar will establish the identity of the applicant by reference to a range of appropriate documents (full birth certificate, passport, or photo card driving licence and an item such as a utility bill which shows the applicant's name and address.) Where appropriate, change of name documentation should also be verified.

All newly appointed staff will be asked to fill in a self-declaration form as required under legislation for those who work or who come into contact with children in the Early Years Foundation Stage. (Supplementary advice to KCSIE)

New staff will be required to make a self-declaration of medical fitness.

Photocopies of all documents will be kept confidentially on the individual's personnel file.

The School obtains written confirmation from supply agencies or third-party organisations that supply staff or other individuals who may work in the School have been appropriately checked and are suitable to work with children.

Trainee teachers will be checked either by the School or by the training provider, from who written confirmation will be obtained confirming their suitability to work with children.

Low level concerns regarding supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

The School maintains a single central record of recruitment checks undertaken.

15.1 Volunteers

Volunteers, including Governors, will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

15.2 Contractors

The School checks the identify of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

16. Site Security

Visitors to the School, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their

children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Head will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

17. Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the School or its employees, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our School, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

18. Staff/pupil online relationships

The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Full details of the School's rules for staff can be found in the Staff Code of Conduct and the School's Staff Handbook.

Anyone working in the School either as a paid employee or volunteer must not communicate with children via social networking or accept requests as 'Friends' or other connections. This applies to both current and former pupils until they reach the age of 18.

19. Child protection procedures

19.1 Recognising abuse

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

Abuse and neglect are forms of maltreatment. Somebody may abuse of neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2025) refers to four categories of abuse. These are set out in Appendix 1 along with indicators of abuse.

19.2 Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidents of bullying, including cyber-bullying and prejudice-based bullying must be reported and will be managed through our anti-bullying procedures

which can be found in the school's Anti-Bullying Policy (available on staff shared for staff and via the school office).

19.3 Taking Action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'. When concerned about the welfare of a pupil, staff should always act in the best interests of the pupil. Key points for staff to remember for acting are:

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern (appendix 2)
- seek support for yourself if you are distressed

All staff have a duty to:

- report any concerns they may have about the safety and / or wellbeing of pupils;
- report any concerns they may have about the safety and / or wellbeing of other persons associated with the School;
- report any safeguarding concerns about staff or anyone else associated with the School; and
- follow up on any such reports to ensure that appropriate action is or has been taken.

The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to children's social care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

19.4 If you are concerned about a pupil's welfare

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

Staff should use the record of concern form (appendix 2) to record any early concerns immediately. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL or DDSL if the DSL is unavailable..

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

19.5 If a pupil discloses to you

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

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

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'this isn't your fault', 'you are doing the right thing in talking to me'
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **record of concern form** and hand it to the DSL as soon as possible
- seek support if they feel distressed

19.6 Notifying parents

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

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

19.7 Risk assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare or safety plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

20. Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, DDSL, Head or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Following several cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2025)* emphasises that **any** member of staff can contact children's social care if they are concerned about a child (see below regarding referrals to children's social care).

Child protection information will be stored and handled in line with the Data Protection Act 2018 (GDPR).

Information sharing will take place in a timely and secure manner and where:

- It is necessary and proportionate to do so; and
- The information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share. Record of concern forms and other written Child Protection information will be stored in a locked location, on a separate Child Protection Drive only available to relevant individuals and on CPOMS.

All Child protection information will be stored separately from the pupil's main school file.

The School understands that information sharing is essential to effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and the Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately, where that information may help to protect a child.

Safeguarding files are shared with the pupil's next school in line with KCSiE (2025) requirements

When the School intends, as a result of a professional or legal duty, or otherwise, to share safeguarding information, the School will, where appropriate, seek to inform their parent(s) or carer(s), and where appropriate the pupil about what information sharing has taken (or will take) place, why and how the information will be used, unless doing so could put a child or others at further risk of harm, or could compromise effective safeguarding arrangements, including police investigations.

When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. Where a request for safeguarding information is received from a parent for an individual aged under 18, the School may be exempt from providing that data where complying with the request would not be in the best interests of the child. The School will also have regard to its data protection policies. The School's Data Protection Lead will work with the DSL as appropriate to determine what should be. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Head or DSL.

The School will co-operate with CSC, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

The Director of Finance and Operations is the School's Data Protection Officer and the School's Privacy Notice is available to parents on the school website.

21. Referral to children's social care

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

Anyone can make contact with children's social care to discuss concerns before a referral is made. This includes professionals, as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting children's social care.

- Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include: **Children in need**: *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled*. Children in need may be assessed under section 17 of the Children Act 1989.
- **Children suffering or likely to suffer significant harm**: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm*.

The threshold document published by Local Safeguarding Partners, City and Hackney Children's Safeguarding Partnership (CHSCP) includes the criteria, including the level of need, for when a case should be referred for assessment and for statutory services under section 17 and 47.

Parental consent is usually expected for referrals to statutory agencies, unless this may expose the child to additional harm or is not considered to be in the child's best interests, as staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

- Personal details of the child including the child's developmental needs;
- Detailed information about the concern;
- Information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

22. Reporting directly to child protection agencies

Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 24 of KCSIE and the flowcharts set out in Chapter 3 of WTSC for information about the likely actions and decisions required.

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, Police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their Deputy, the Head and the Chair of Governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

23. Additional Reporting

In addition to the reporting requirements outlined above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

- **Health and Safety Executive** - the School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive.

- **Ofsted** - the School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision registered with Ofsted (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations. The School will notify Ofsted of such allegations as soon as is reasonably practicable, but in any event within 14 days of the allegations being made. The School will also notify Ofsted of any significant event which is likely to affect its suitability to look after children or the suitability of any person who cares for / is in regular contact with children on the premises. The School will notify Ofsted of such events as soon as is reasonably practicable, but in any event within 14 days of the event.

- **Insurers -** the School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies. Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

24. Child-on-child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children can abuse other children and young people and should be clear about the school's policy and procedures regarding child-on-child abuse. Staff will maintain an attitude of 'it could happen here'. All child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can take many forms, including:

- **physical abuse** such as shaking, biting, hitting, kicking or hair pulling
- **bullying,** including cyberbullying, prejudice-based and discriminatory bullying
- **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape
- **causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery**) including pressuring another person to send sexual imagery or video content
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** – such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- **upskirting** – taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm
- **initiation/hazing** – used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Staff understand that whilst it is more likely that girls will be victims and boys perpetrators of child-on-child abuse, all forms of child-on-child abuse are unacceptable and will be taken seriously.

Staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but simply not reported.

24.1 Minimising risk

A whole school approach to preventative education ensures that the curriculum, school policies, pastoral support and whole school ethos complement each other to create an environment that helps to prevent negative behaviour. We take the following steps to minimise the risk of child-on-child abuse.

- an open and honest environment where young people feel safe to share information about anything that is upsetting them
- access for pupils to wide-ranging pastoral support including, Form Teacher, Head of Year, Deputy Head, Learning Support Team, Nurse, Mental Health First Aider, Counsellor, Residential Duty Team, Chaplain and Wish and Worry box
- assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying

- Form Time, TPR and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities
- staff will endeavour always to create surroundings where everyone feels confident and at ease in school
- we will ensure that the school is well supervised, especially in areas where children might be vulnerable
- staff receive regular training on child-on-child abuse during safeguarding updates and via online training from Educare.

24.2 Managing allegations of child-on-child abuse and supporting those involved

Pupils have access to wide-ranging pastoral support including Form Teacher, Heads of Year, Deputy Head, Safeguarding Team, Learning Support Team, Nurse, Counsellor, Mental Health First Aider, Residential Duty Team, and Chaplain. Children know they are able to reach out to any member of staff with any concern at any time.

Children know that concerns will be followed up immediately. The practice of encouraging children to share is revisited during PSHE lessons, form times and the assembly programme. The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

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

Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The School recognises that in cases of child-on-child abuse all the children involved, whether perpetrator or victim, are treated as being "at risk" and will act accordingly to safeguard their welfare.

The DSL (or DDSL) should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact the City of London Children's Services Team, and in any event within 24 hours of the DSL becoming aware of it. In these cases, the City and Hackney Safeguarding Children's Partnership (CHSCP) Threshold of Needs Document should be used
https://www.londonsafeguardingchildrenprocedures.co.uk/thresholds.html

The DSL will discuss the allegations/concerns and agree on a course of action, which may include:

- Manage internally in line with the behaviour management policy and with help from external specialists where appropriate and possible.
- Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.
- Refer child/children to children's social care. Depending on the circumstance, the Police may be involved.
- In all of the scenarios, the school, along with the relevant agencies or specialists will support both the child who has experienced the abuse, ensuring that further abuse does not take place as well as helping children overcome any difficulties arising from the original situation.
- What support the victim requires depends on the individual child and their parents or carers and they will also be consulted, and a support plan will be drawn up.
- If the incidents are also of a bullying nature, the child may need support in improving relationships amongst their peer group or with other young people. Strategies will be put in place to monitor and support all the children involved. This may include 1:1 mentoring.
- The alleged perpetrator is also likely to need support as they may have unmet needs as well as the risk they could pose to other children. This could involve counselling or 1:1 mentoring.
- Other interventions for wider groups of children that may be considered could target a whole class or year group for example.
- All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing, kept confidential and stored securely on the school's child protection and safeguarding system (CPOMS) and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

25. Serious Violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

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

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or

increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

The school includes the risks of criminal exploitation and sexual exploitation in the PSHE and SRE curriculum. A common feature of such exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

26.1 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL.

26.2 Child Criminal Exploitation (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves, They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicators can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol
- go missing for periods of time or regularly return home late
- regularly miss school or education or do not take part in education.

26.3 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out under CCE, above.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out under CCE, above, with the main indicator being missing episodes from home and/or school. Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from home
- have been the victim or perpetrator of serious violence (eg. knife crime).
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation with which they have no connection or in a hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

If a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation. Where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

27. Online Safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology including AI and Generative AI has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

The School ensures that appropriate and effective filters and monitoring systems are in place to block harmful and inappropriate content by managing the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. We take care to ensure that these

systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils. Our filtering and monitoring systems are reviewed regularly (at least annually) to ensure their effectiveness.

The school refers to the DfE guidance 'plan technology for your school service' to self-assess against the filtering and monitoring standards.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents and carers of what we are asking children to do online, including sites they need to access, and with whom they will be interacting online. We run online safety workshops for parents and online safety for pupils is regularly addressed in assemblies, PSHE and ICT lessons.

The School also ensures that appropriate levels of security protection procedures are in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

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

- **Content** – being exposed to illegal, inappropriate or harmful content such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact –** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group.

All staff are aware of these risk areas and should report any concerns to the DSL or DDSLs.

The School is alert to the need to proactively prepare specifically for recognising and responding to incidents related to generative AI in Education and refers to the DfE guidance 'Generative artificial intelligence (AI) in Education' https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education when managing these issues. Any safeguarding related issues related to AI must be referred to the DSL or a DDSL.

28. Sharing nudes and semi nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apples' AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and

young people may include ‘dick pics’. Other terms used in education include ‘sexting’, ‘youth produced sexual imagery’ and ‘youth involved sexual imagery’.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

All incidents involving youth produced sexual imagery will be responded to as follows:

- the incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved
- parents will be informed at any early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- at any point in the process, if there is concern a young person has been harmed or is at risk of harm a referral will be made to children’s social care and/or the police immediately in accordance with this policy.

Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

The DSL may in exceptional circumstances view images with prior approval of the Head and only where:

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report; or
- a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required. In some instances, it may be necessary to refer the matter to the Police. Once a report is made to the Police, the report must be recorded, and the Police will investigate. This may include seizure of devices and interviews with the young people involved. If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm this is done. Members of staff should not search devices to delete images.

If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a pupil receives unwanted images, the School should advise the pupil and their parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in March 2024 – https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people. The school will have regard to this advice when managing these issues.

29. Domestic Abuse

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, economic and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse through seeing or hearing such abuse can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Where Police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the School has up to date safeguarding information about the child.

All staff are aware of the impact domestic abuse can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL..

Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

30. Honour-based abuse

So called 'Honour-based' abuse (HBA) is abuse (regardless of motivation) and should be handled and escalated as such. It encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are aware of this dynamic and will consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth. Teachers must report known cases of FGM to the police. All other staff should refer FGM to the DSL.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware or risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Children may be married at a very young age, and well below the age of consent in England. School staff receive awareness training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not allowed to return to England.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

31. Radicalisation and extremism

The Government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Children are vulnerable to extremist ideology and radicalisation. As part of the Counter Terrorism and Security Act (2015), schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

There is no single way of identifying if a child is susceptible to extremist ideologies and radicalisation can occur through a number of different methods, which may include family, social media, the internet. Islamic extremism is the most widely publicised form of radicalisation but the school remains alert to the risk of radicalisation into white supremacy extremism.

As with other safeguarding risks staff should remain alert to changes in a pupil's behaviour and speech which could indicate they are in need of protection.

Staff receive training to help identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture. Where staff are concerned that pupils are developing extremist views or show signs of becoming radicalised, they must discuss this with the DSL/DDSL. The DSL will follow the Channel guidelines for reporting concerns around radicalisation.

The City of London provides advice for managing concerns around radicalisation https://democracy.cityoflondon.gov.uk/documents/s159450/Item%201%20-%20Prevent%20Policy%20and%20Channel%20Guidance.pdf and the school will have regard to this advice.

Given the school's location staff receive training from City Police in awareness around possible terrorist threats and the school has an Emergency Management Plan to deal with emergency situations other than Fire.

32. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent of close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged 18 if the child is disabled. By law, a parent private foster carer or other persons involved in make a private fostering arrangement must notify children's services as soon as possible. The City of London private fostering arrangements can be found here : https://www.cityoflondon.gov.uk/services/children-and-families/private-fostering

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the School will notify the Local Authority of the circumstances.

33. Special Circumstances

33.1 Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local Authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

33.2 Boarding Schools

Research has shown that children can be particularly vulnerable in residential settings. All boarding schools and residential special schools comply with the National Minimum Standards for their particular setting and are appropriately inspected.

In line with KSCIE and the NMS for Boarding Schools, we will ensure that boarding accommodation is safe, secure, and subject to 24-hour supervision, with clear boundaries that respect pupils' privacy while enabling staff to fulfil their safeguarding responsibilities. Boarding pupils are expected to comply with reasonable instructions of the boarding staff. Their welfare is closely monitored and they will have regular opportunities to meet privately with Boarding and other pastoral staff and information is shared appropriately with the DSL who retains overall responsibility for the welfare of these pupils while they are in our care. The DSL will manage any concerns with reference to the pupil's home local authority safeguarding arrangements and will liaise with parents and /or a named guardian, where appropriate.

We recognise that these pupils may face additional safeguarding challenges due to their separation from their parents and carers and as a result of living away from home. For these children, the risk of bullying (both in person and online), child on child abuse, inappropriate relationships and emotional isolation is greater and strong allegiances or blind spots can develop which risk creating a dynamic of power and control that can be abused. We have clear rules of acceptable conduct for staff and pupils which relate to the boarding context and include reference to local risks outside the school grounds. We provide additional training on maintaining effective relationships and on how to recognise and report behaviour of concern to boarding staff and pupils. Boarders are empowered to raise concerns and make suggestions for changes and improvements, which are taken seriously, and we offer a range of ways for concerns to be reported, which include access to an independent listener, separate from the school, if preferred. Unless specifically agreed in advance, the school is not responsible for exeat weekends, half-term and holiday arrangements, particularly accommodation but does confirm transport arrangements for all leave.

All residential staff will receive enhanced safeguarding training relevant to the boarding context and should be aware of the following:

- staff should maintain professional standards of behaviour and appropriate boundaries at all times in relationships between themselves and the pupils
- positive relationships between residential boarding staff and pupils are key to a happy and successful boarding experience for pupils, but staff must be aware of and comply with the guidelines set out in the Code of Conduct at all times
- residential staff should be aware of the potential for abuse of children by their peers in the boarding environment
- the procedure for reporting concerns is the same as for the non-boarding pupils.

The School will report safeguarding matters to the BSA as required by their safeguarding charter.

33.3 Looked After Children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The School ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The Designated Teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

Appendix One

Four categories of abuse

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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

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); or
- ensure access to appropriate medical care or treatment. It may also include affluent neglect or neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or

trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

• have bruises, bleeding, burns, fractures or other injuries
• show signs of pain or discomfort
• keep arms and legs covered, even in warm weather
• be concerned about changing for PE or swimming
• look unkempt and uncared for
• change their eating habits
• have difficulty in making or sustaining friendships
• appear fearful
• be reckless with their own or other's safety
• self-harm
• frequently miss school, arrive late or leave the school for part of the day
• show signs of not wanting to go home
• display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
• challenge authority
• become disinterested in their school work
• be constantly tired or preoccupied
• be wary of physical contact
• be involved in, or particularly knowledgeable about drugs or alcohol
• display sexual knowledge or behaviour beyond that normally expected for their age
• acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

Appendix Two:

Record of Concern

Child's Name:			
Child's DOB:			
Male/Female	Ethnic Origin	Disability Y/N	Religion
Date and time of concern:			
Additional information: (context of concern/disclosure)			
Your name:		Your signature:	
Position in school:		Date and Time of this record:	
Action and response of DSL:			
Feedback given to member of staff reporting concern:		Information shared with any other staff? If so, what information and rationale for doing so?	

Return completed from to Designated Safeguarding Lead: Caroline Heylen or

Deputy Designated Safeguarding Lead: Joe Gorman, Julie Schindler, Kim Thomas

Review Date: August 2026

Appendix Three

ST PAUL'S CATHEDRAL SCHOOL

Low Level Concern Form

This form is used by the Head, DSL (or other member of senior leadership team authorised by the Head) to record any matter of low-level concern or behaviour reported or otherwise brought to the Head or DSL's attention that may constitute a breach of the school's Code of Conduct, including inappropriate conduct outside of work. Where concerns amount to allegations reaching the 'harm threshold', the matter will be reported directly to the Local Authority Designated Officer. Relevant correspondence and documentation (e.g. first-hand accounts, risk assessments) must be attached. LLCs will be reviewed for lessons learned.

Response of subject of the LLC
Provide details, and give rationale if a decision is taken not to inform the subject of the LLC
Action Taken Include • Whether advice/guidance was sought from the Local Authority Designated Officer, and if so, details of any guidance given • Details of any actions undertaken • Details of any investigation including outcome, risk assessment, disciplinary action, referral to or involvement of external agencies • Rationale for actions/decision-making • Any support put in place for the subject of the LLC or the person reporting the LLC

Signed :	**Dated :**

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties in line with the school's statutory duties.

This record form will be held securely, either digitally or in paper form, in one central file in accordance with guidance regarding the management of concerns and or allegations and the school's Data Management practices/policies.

Review Date: August 2026