GALLEYWALL PRIMARY
CITY OF LONDON ACADEMY

ASPIRATIONAL | COMPASSIONATE | RESILIENT | RESPONSIBLE | CURIOUS

Bermondsey, London www.galleywall.co.uk

Safeguarding Policy

Last reviewed: MAB Aug 2026
Ratified by Governors: Sep 2026
Next review: Sep 2027

Section 1: Aims

A School Aims

i Appropriate action is taken in a timely manner to safeguard and promote children's welfare

ii The school must promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities

iii All staff are aware of their statutory responsibilities with respect to safeguarding

iv Staff are properly trained in recognising and reporting safeguarding issues

Section 2: Legislation and Statutory Guidance

A Related Policies

i This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025 and 26) and Working Together to Safeguard Children (2023), the Maintained Schools Governance Guide and Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

ii Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

iii The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

iv Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

v Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

vi The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

vii Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

viii Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

ix The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (EHCR)

x The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

xi The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

xii The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

xiii Policy paper "Generative artificial intelligence (AI) in education"

xiv This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

xv This policy also complies with our funding agreement and articles of association.

xvi This policy complies with the London Borough of Southwark safeguarding procedures.

Section 3: Definitions

A Safeguarding and promoting the welfare of children means:

i Providing help and support to meet the needs of children as soon as problems emerge

ii Protecting children from maltreatment whether that is within or outside the home, including online

iii Preventing impairment of children's mental and physical health or development

iv Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

v Taking action to enable all children to have the best outcomes

B Child protection

i Activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

C Abuse

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

D Neglect

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

E Sharing of nudes and semi-nudes

i Sharing of nudes and semi-nudes(also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

F Children

i Everyone under the age of 18.

G Safeguarding partners

i The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

H Victim

i Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

I Alleged perpetrator(s) and perpetrator (s)

i Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Section 4: Equality statement

A Rationale

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

B We give special consideration to children who:

i Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)

ii Are young carers

iii May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

iv Have English as an additional language (EAL)

v Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

vi Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation

vii Are asylum seekers

viii Are at risk due to either their own or a family member's mental health needs

ix Are looked after or previously looked after (see section 12)

x Are missing or absent from education for prolonged periods and/or repeat occasions

xi Whose parent/carer has expressed an intention to remove them from school to be home educated

Section 5: Roles and Responsibilities

A Responsibility:

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

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

i Behaviour policy

ii Pastoral support system

iii Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

iv Healthy and respectful relationships

v Boundaries and consent

vi Stereotyping, prejudice and equality

vii Body confidence and self-esteem

viii How to recognise an abusive relationship (including coercive and controlling behaviour)

ix The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support

x What constitutes sexual harassment and sexual violence and why they're always unacceptable

B All Staff

All staff will:

i Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually

ii Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance

iii Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

iv Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

i Our systems that support safeguarding, including this child protection and safeguarding policy; the staff handbook, the supply teacher pack, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education

ii The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

iii The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

iv What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

v The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

vi New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm

vii The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

viii The fact that children can be at risk of harm inside and outside of their home, at school and online

ix The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children

x That a child and their family may be experiencing multiple needs at the same time

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

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

C The designated safeguarding lead (DSL)

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

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

In an emergency, the DSL and/or DDSLs may be contacted by phone or e-mail.

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

There is a DDSL available during out-of-hours activities.

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

xii Provide advice and support to other staff on child welfare and child protection matters

xiii Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

xiv Contribute to the assessment of children

xv Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

xvi Have a good understanding of harmful sexual behaviour

xvii Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL and deputy DSLs will also:

i Liaise with local authority case managers and designated officers for child protection concerns as appropriate

ii Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

iii Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

iv Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and DDSLs are set out in their job descriptions.

D The Governing Board

The governing board will:

v Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

vi Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation

vii Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

viii Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

ix Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

x Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

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

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

E The Headteacher

The Headteacher must make sure:

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

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

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

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

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

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

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

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

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

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

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

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

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

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

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

xiv Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

xv Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

xvi Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

xvii Ensuring the relevant staffing ratios are met, where applicable

xviii Making sure each child in the Early Years Foundation Stage is assigned a key person

xix Overseeing the safe use of technology, mobile phones and cameras in the setting.

Section 6: Confidentiality

A Sharing

At Galleywall, data and information relating to safeguarding is shared when this is necessary to protect the safety or welfare of a child or staff member, or to enable a staff member to safeguard a child effectively, or to pass information on to wider authorities/parents and carers where applicable. Our approach to confidentiality adheres to these principles;

i Timely information sharing is essential to effective safeguarding

ii Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

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

iv If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

v Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

vi If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

vii There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

viii The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

ix The DSL should consider that:

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

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

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

xiii Regarding anonymity, all staff will:

xiv Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

xv Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved

xvi Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

xvii The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

xviii If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

xix Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

xx In the event that a pupil changes setting, ensure that safeguarding information is passed to the new setting as soon as reasonable, and certainly within five working days.

Section 7: Recognising abuse and taking action

A Duty of all staff

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

i Is disabled

ii Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

iii Is a young carer

iv Is bereaved

v Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime

vi Is frequently missing/goes missing from education, care or home

vii Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

viii Is at risk of being radicalised or exploited

ix Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

x Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

xi Is misusing drugs or alcohol

xii Is suffering from mental ill health

xiii Has returned home to their family from care

xiv Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage

xv Is a privately fostered child

xvi Has a parent or carer in custody or is affected by parental offending

xvii Is missing education, or persistently absent from school, or not in receipt of full-time education

xviii Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

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

B If a child is suffering or likely to suffer harm, or in immediate danger.

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

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

iii To report directly to Southwark Council; make a referral to MASH here

iv Member of the community can report directly to Southwark Council by making a referral to MASH (click here)or phone Childline on: 0800 1111

v More information can be found on the GOV.UK website; https://www.gov.uk/report-child-abuse-to-local-council

C If a child makes a disclosure to staff

If a child discloses a safeguarding issue to a staff member, they should:

i Listen to and believe them. Allow them time to talk freely and do not ask leading questions

ii Stay calm and do not show that they are shocked or upset

iii Tell the child they have done the right thing in reporting the issue. They should not tell the child they should have told someone sooner.

iv They should find out as much detail as possible without asking leading questions e.g. DO ask 'What do you mean? Or 'Where', Who' or What' questions, DO NOT ask questions that may lead the child to an answer such as 'Does he hit you on the arm?'

v Explain what will happen next and that they will have to pass this information on. Do not promise to keep it a secret

vi Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put their own judgement on it

vii Add the account to CPOMS (our digital recording platform) and inform the DSL or a deputy DSL. Visitors who do not have access to CPOMS, should sign and date the written account and pass to a DLS or deputy DSL. Alternatively, if appropriate, they should make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that they have done so. Aside from these people, the information should not be disclosed to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Staff should bear in mind that some children may:

i Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

ii Not recognise their experiences as harmful

iii Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop anyone from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

D Discovering that FGM has taken place or pupil is at risk of FGM

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

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

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

Any teacher who either:

iv Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures. Members of the community can report directly to Southwark Council by making a referral to MASH (click here)or phone Childline on: 0800 1111

E If a staff member has concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

vi Figure 1 below, before section 7.7, illustrates the procedure to follow if there are any concerns about a child's welfare.

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

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

ix A referral to local authority children's social care should be made directly, if appropriate (see 'Referral' below) with any action taken shared with the DSL as soon as possible.

F Early Help Assessment

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

The school can make referrals to Early Help themselves or on the instruction of parents/carers through Southwark Council.

G Referral

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

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

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Members of the community can report directly to Southwark Council by making a referral to MASH (click here)or phone Childline on: 0800 1111

H Concerns about Extremism

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

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

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

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also

email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

x Think someone is in immediate danger

xi Think someone may be planning to travel to join an extremist group

xii See or hear something that may be terrorist-related

I Concerns about Mental Health

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

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

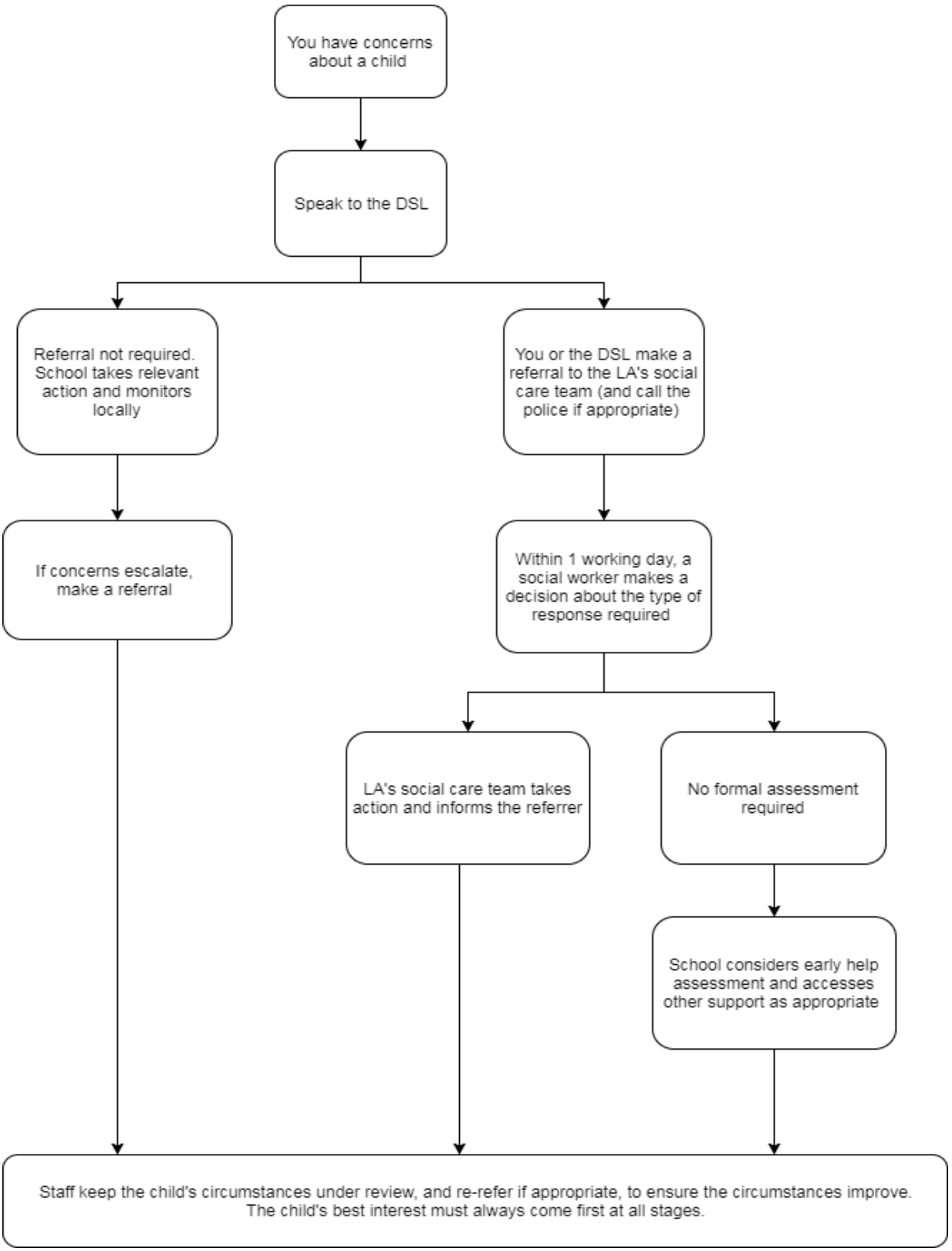
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

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

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



J Concerns about a Staff Member, Volunteer, Supply Teacher or Contractor

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

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

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

iv If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

v Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

K Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

i Is serious, and potentially a criminal offence

ii Could put pupils in the school at risk

iii Is violent

iv Involves pupils being forced to use drugs or alcohol

v Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

vi Can involve discriminatory behaviour, including racism and faith targeted abuse.

Procedures for dealing with allegations of child-on-child abuse

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

i You must record the allegation and tell the DSL, but do not investigate it

ii The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

iii The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

i Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

ii Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

iii Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

iv Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

v Ensure staff reassure victims that they are being taken seriously

vi Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

vii Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

viii Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

ix Ensure staff are trained to understand:

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

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

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

xiii Children can show signs or act in ways they hope adults will notice and react to

xiv A friend may make a report

xv A member of staff may overhear a conversation

xvi A child's behaviour might indicate that something is wrong

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

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

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

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

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

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

i Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

ii There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

L Sharing of nudes and semi-nudes (sexting)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the emergency number.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding online relationships as part of our RSE programmes. Teaching may cover the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first

- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

M Reporting Systems for Pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Section 8: Prevention

A PSHE Programme

See PSHE policy and curriculum

B Staff Development

All staff will receive annual training on KCSIE and there will be regular updates in staff meetings. Prevent will form part of this programme.

Annex 1: Categories of Abuse

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

ii This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

iii Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

iv Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

vii Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Verbal abuse such as criticism, belittling, or name-calling

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Note: children are more likely to know their abuser than not, and that those under the age of 13 can never legally consent to sexual activity

ix 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.

x Once a child is born, neglect may involve a parent or carer failing to:
Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
Protect a child from physical and emotional harm or danger
Ensure adequate supervision (including the use of inadequate care-givers)
Ensure access to appropriate medical care or treatment

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

xii Racism, faith-based prejudice, and other discrimination is a harm in its own right, which can significantly affect a child's welfare, wellbeing, and sense of safety

Annex 2: Allegations of abuse made against staff

Section 1: allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education (KCSIE) 2026. Amend or add to this as applicable to reflect your own approach.

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors [in independent schools: proprietor] where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

Based on an assessment of risk, we will consider alternatives such as:

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

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

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

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

Early years providers add:

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

All schools continue with:

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

- If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.
    - We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
    - The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
    - We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
    - We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

- Unsubstantiated, unfounded, false or malicious allegations
- If an allegation is:
    - Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
    - Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it
- Confidentiality and information sharing
- The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:
    - Who needs to know about the allegation and what information can be shared
    - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
    - What, if any, information can be reasonably given to the wider community to reduce speculation
    - How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

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

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

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

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

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

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

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

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

- The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy / code of conduct]. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.
- [Add more detail about your procedures for responding to low-level concerns. Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

Record keeping

- All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
- Records will be:
  - Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
  - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as

described in section 1 of this appendix, we will refer it to the designated officer at the local authority
    - Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.
- References
- We will not include low-level concerns in references unless:
    - The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
    - The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Annex 3: Safeguarding Posters

All posters are here: https://www.galleywall.co.uk/safeguarding3/113528.html

Annex 4: Toilets

Local authority maintained schools are required to comply with Regulation 4 The School Premises (England) Regulations 2012, which states the following:

1. *Subject to paragraph (3), suitable toilet and washing facilities must be provided for the sole use of pupils.*
2. *Separate toilet facilities for boys and girls aged 8 years or over must be provided except where the toilet facility is provided in a room that can be secured from the inside and that is intended for use by one pupil at a time.*
3. *Where separate facilities are provided under paragraph (1) for pupils who are disabled, they may also be used by other pupils, teachers and others employed at the school, and visitors, whether or not they are disabled.*
4. *Suitable changing accommodation and showers must be provided for pupils aged 11 years or over at the start of the school year who receive physical education.*
5. *Children who identify other than with their biological sex must use not use the facilities provided for the opposite biological sex, but must have alternative arrangements.*

Annex 5: Further compliance provisions for KCSIE 2026

Section 1: Staff Reading Requirements
All staff are required to read all of KCSIE Part 1. This will be enforced in staff training.
Section 2: AI and Deepfakes
Integrates definition, curriculum, and pastoral responses to AI-generated harms. Section 3C above is clear on this.
Section 3: Gender Questioning and School Premises
Strict rules for single-sex spaces – see above.
Section 4: Updated Volunteer Regulated Activity Rules
Volunteering more than 3 days in 30 days (or overnight) requires a barred list check regardless of supervision. This will be actioned by HR staff.
Section 5: Filtering and Monitoring
Standardises the mandatory annual review of school digital infrastructure. This is carried out by the Trust.
Section 6: Peer Abuse & Early Intervention

Incorporates refreshed Part Five elements addressing misogyny and harmful sexual behaviour early. This is clear from section 5A above.