

Child Protection and Safeguarding Policy

Introduction

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 When at school their behaviour may be challenging and defiant or they may be withdrawn.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

Board of Trustees

- The Board of Trustees has appointed a trustee, Simon Weston, to take leadership responsibility for safeguarding arrangements.
- The Board of Trustees will:
 - have regard to guidance published by the Department for Education, including:
 - Keeping Children Safe in Education 2023;

- Filtering and monitoring standards for schools and colleges
 - Keeping Children Safe during Community Activities, After-School Clubs and Tuition
 - Sharing nudes and semi-nudes: advice for education setting working with children and young people 2020;
 - Prevent Duty Guidance: for England and Wales (April 2021);
 - Information Sharing 2018;
 - Relationships education, relationships and sex education (RSE) and health education (September 2021); and
 - Working Together to Safeguard Children (dated 2018 but updated in 2022).where the School has charitable status, have regard to Charity Commission guidance on charity and trustee duties to safeguard children;
- follow the local practice guidance of the Gloucestershire Safeguarding Children's Partnership; <https://www.gloucestershire.gov.uk/gscp/>
 - establish clear policies on drugs, alcohol and substance misuse;
 - ensure that safeguarding training for staff, including online safety training (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), and safeguarding teaching for children, including online safety, is integrated, aligned and considered as part of the whole School safeguarding approach and wider staff training and curriculum planning having regard to the Teachers' Standards guidance;
 - have overall strategic responsibility for filtering and monitoring and will seek assurance that the filtering and monitoring standards for schools and colleges (March 2023) are being met;
 - establish robust health and safety and emergency evacuation procedures;
 - ensure that appropriate arrangements are in place to keep children safe where School facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate Disclosure and Barring Scheme checks;
 - ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement;
 - ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should

equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated;

- be aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention.

Head teacher

- The Head teacher will take reasonable measures to:
 - protect each pupil from any form of abuse, whether from an adult or another pupil;
 - be alert to signs of abuse both in the School and from outside and deal appropriately with every suspicion or complaint of abuse;
 - support children who have been abused;
 - ensure that we practise safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education 2023 and the Education (Independent School Standards) (England) Regulations 2014 as amended;
 - ensure that we carry out all necessary checks on the suitability of people who serve as members and/or on the School's Board of Trustees;
 - ensure that all staff who work directly with children read at least part 1 of Keeping Children Safe in Education 2023 and that staff who do not work directly with children read at least the condensed Part 1 Annex A) of Keeping Children Safe in Education 2023 and that all staff receive training to assist them to understand and discharge their role and responsibilities;
 - ensure that where the School ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS) within one month;
 - ensure that staff follow and implement the Safeguarding and other policies adopted by the Board of Trustees, particularly those concerning referrals of cases of suspected abuse and neglect, which should be

transparent, clear and easy to understand for staff, pupils, parents and carers;

- ensure that staff implement appropriate filters and monitoring of online material;
- appoint a designated teacher to promote the educational achievement and welfare of looked after children;
- check that appropriate child protection arrangements are in place when pupils attend offsite activities; and
- ensure that the School premises are fit for purpose and take all practicable steps to ensure that the premises are secure. Visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises.

Designated Safeguarding Lead

- The School has appointed a senior person with the necessary status and authority (**Designated Safeguarding Lead**) to be responsible for matters relating to child protection and welfare. This designated person at the School is Fran Bailey who can be contacted at fbailey@klbschool.org.uk. Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the school, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher or the Head teacher who will notify the Designated Safeguarding Lead in accordance with these procedures.
- The main responsibilities of the Designated Safeguarding Lead are:
 - to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection;
 - to co-ordinate the child protection procedures in the School;
 - to understand the School's filtering and monitoring systems and processes, which is explicit in their job description; to ensure that all staff undergo safeguarding training, including online safety training and understanding the filtering and monitoring systems and processes in place, at induction and to maintain an ongoing programme for staff and trustees (temporary staff and volunteers will be made aware of child protection procedures and the requirement to follow them);
 - to put in place safeguarding and online safety training updates, including understanding the filtering and monitoring systems and processes in place, at least annually;
 - to keep records of staff and trustee training on child protection procedures;
 - to monitor records of pupils in the School who are subject to child protection plans to ensure that these are maintained and updated;
 - to take part in child protection conferences or reviews;

- to inform social services in writing when a child who is subject to a child protection plan moves to another school and to inform the new school of the child protection plan; and
 - to monitor the keeping, confidentiality and storage of records in relation to child protection.
- The Designated Safeguarding Lead for the School will:
 - advise and act upon all suspicion, belief and evidence of abuse reported to them;
 - keep the Head teacher informed of all actions unless the Head teacher is the subject of a complaint. In this situation, the Designated Safeguarding Lead should consult with the Chair of the Board of Trustees, without notifying the Head teacher;
 - in conjunction with the Head teacher, carry out the Gloucestershire County Council Safeguarding Children declaration each year, produce an action plan and annually report back to the Board of Trustees at the Community and Wellbeing Committee;
 - refer cases of suspected abuse or neglect to the relevant agencies where appropriate;
 - liaise with external agencies;
 - consider the guidance “NSPCC – When to call the police” to understand when to call the police and what to expect when they do; and
 - keep parents informed of action to be taken under these procedures in relation to their child.
- If the Designated Safeguarding Lead is unavailable their duties will be carried out by two Deputy Designated Safeguarding Leads, who have received appropriate training. The Deputy Designated Safeguarding Leads are Debbie Gardner (dgardner@klbschool.org.uk) and Lesley Ford (lford@klbschool.org.uk)
- The Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads have undertaken level 3 child protection training and training in inter-agency working and will attend refresher training at two-yearly intervals. As well as this formal training, their knowledge will be updated (for example, by bulletins) at least annually.
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Abuse

- Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused by those who know them or by others. 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. Abuse can be:

- physical abuse, for example shaking, beating or punching, scalding, drowning or suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child;
 - emotional abuse (the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development), for example rejection and denial of affection, interactions that are beyond a child's developmental capability, overprotection and limitation of exploration and learning. It may also include seeing the ill treatment of another and/or causing children to feel frightened. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone;
 - sexual abuse (forcing or enticing a child or young person to take part in sexual activities whether or not the child is aware of what is happening), for example sexual assault or encouraging a child to view pornographic material. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child or child on child abuse) in education and all staff should be aware of it and of the School's policy and procedures for dealing with it; and
 - neglect (the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development), for example failure to provide appropriate care including food, clothing, shelter and/or medical attention. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- Staff should be aware that abuse is rarely a standalone event that can be covered by one definition.
 - Children may be abused by adults or other children. The School takes a zero-tolerance approach and abuse will never be tolerated or passed off as banter or part of growing up. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero-tolerance for sexism, misogyny/misandry, homophobia, biphobic, transphobic and sexual violence/harassment.
 - Child on child abuse can happen both inside and outside of the School and online. No reports of child on child abuse does not mean it is not happening and therefore if staff have any concerns regarding child on child abuse they should speak to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.
 - Child on child abuse may include:
 - Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between peers (this is sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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)
- Upskirting, which is now a criminal offence and typically involves taking a picture under a person’s clothing without their permission and/or without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.
- Staff recognise that some types of abuse may be more prevalent for girls (such as sexual assaults) and other types for boys (such as physical violence). Any abuse by pupils will be subject to disciplinary action under the School’s Behaviour and Discipline policy.
- Some children may be particularly vulnerable and have an increased risk of abuse. The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children.
- We believe that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The School will give special consideration to, amongst others, children who have special educational

needs; are vulnerable to being bullied; are looked after or living in unsupportive home situations.

- All staff should be clear as to the School's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Signs of abuse

- Possible signs of abuse include (but are not limited to):
 - the pupil says that they have been abused or asks a question which gives rise to that inference;
 - there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
 - the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour;
 - the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
 - the pupil's development is delayed;
 - the pupil is concerned about changing for PE;
 - the pupil is displaying sexual knowledge or behaviour beyond that expected for his/her age;
 - the pupil loses or gains weight;
 - the pupil appears neglected, e.g. dirty, hungry, inadequately clothed; or
 - the pupil is reluctant to go home.
- Staff are aware that behaviours linked to pupils who take drugs, abuse alcohol, truant or engage in consensual and non-consensual sharing or nude or semi-nude images and/or videos will put children in danger. If staff are ever unsure they should always speak to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead.
- All staff should be aware of the range of risk factors which increase the likelihood or 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.
- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial

harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Children who are absent from Education

- All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs. A child going missing from education is a potential indicator of abuse or neglect. A child being absent from education for prolonged periods and/or on repeat occasions, and children missing education can act as a vital warning sign of a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines and such children are at risk of being victims of harm. Staff should follow the School's procedures for dealing with children who are absent from education, particularly on repeat occasions, to help prevent the risk of their going missing in future.
- The School will endeavour to hold where possible more than one emergency contact number for each pupil.
- The School will notify the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days. The School will also notify the local authority when a pupil's name is to be deleted from the admissions register.

Preventing Radicalism

- The School has a duty to give due regard to the need to prevent people from being drawn into terrorism (Prevent Duty). Staff will assess the risk of any pupils being susceptible to radicalisation. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is defined by HM Government as "Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas."
- If a member of staff has a concern about a pupil they should follow the safeguarding procedures set out in this policy, including making a referral to the Designated Safeguarding Lead. The Designated Safeguarding Lead shall make a referral to the Channel programme or assist a member of staff in making a referral where a pupil is identified that may be at risk of being drawn into terrorism. This provides support at an early stage for people who are vulnerable to being drawn into terrorism. The School will co-operate with the police in undertaking the initial assessment. In circumstances where a pupil is being discussed, the Designated Safeguarding Lead will attend the panel meetings.

- The School will seek to engage with pupils' parents. Staff will assist and advise parents who raise concerns and point them towards support mechanisms.
- The School will build pupil's resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others. The School will filter websites and monitor usage of the internet to endeavour to protect pupils from terrorist and extremist material. We will not permit speakers who may promote extremist views on our premises.
- Staff should recognise potential indicators of risk including: pupils distancing themselves from their cultural or religious heritage; making significant changes to their appearance; family and/or community tensions and events affecting their country of origin and alienation from UK values. Staff in making a judgement will ask questions such as: is the pupil known to have possessed extremist literature; does the pupil support extremist groups; is there evidence of extremist ideological, political or religious influence on the pupil?
- The School will ensure that the Designated Safeguarding Lead undertakes awareness training to comply with the Prevent duty. The Designated Safeguarding Lead will provide advice and support to members of staff on protecting children from the risk of radicalisation.
- The Department for Education has a dedicated helpline (020 7340 7264) that staff and trustees may use to raise concerns relating to extremism.

So-called 'honour' based abuse

- Staff should be alert to any signs of so-called 'Honour-based' abuse. It is a crime or incident which has been committed to allegedly protect or defend the honour of the family and/or community. It occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly the victims and the abuse is often committed with some degree of approval and/or collusion from family or community members.
- The School promotes mutual respect and tolerance of those with different faiths and beliefs. If a member of staff has a concern that a child may be at risk of honour-based abuse, they should report it promptly to the Designated Safeguarding Lead who will contact as appropriate external agencies.
- Female Genital Mutilation (**FGM**) is a form of honour-based abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.
- There are a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, include

taking the girl out of the country for a prolonged period or talk of a 'special procedure' or celebration.

- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), places a statutory duty upon teachers to report to the police, where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Anyone failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should not be examining pupils. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Teachers should still consider and discuss any such case with the Designated Safeguarding Lead.
- The duty to report FGM to the police does not apply in relation to at risk or suspected cases or in cases where the woman is aged 18 or over. Teachers should follow the safeguarding procedures set out in this policy in those circumstances.
- Forced marriage is a form of honour-based abuse. Staff should be alert to any signs of forced marriage. It is illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure is used. It also includes causing a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. It is not the same as an arranged marriage. Children at risk of forced marriage might have their freedom unreasonably restricted or are being monitored by siblings.

Lesbian, gay, bi or trans ("LGBT") students

- The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The School endeavours to provide a safe space for LGBT children to speak out or share their concerns with trusted members of staff.

Sexual violence

- Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent.
- Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Harmful sexual behaviour

- Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sexual violence and sexual harassment between children

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

of sexual harassment, the need for a risk assessment will be considered on a case by case basis. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

- The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the Designated Safeguarding Lead who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the Designated Safeguarding Lead will balance the victim's wishes against their duty to protect the victim and other children.
- The School will consider intra familial harms and whether any support for siblings is necessary following an incident.
- For all cases of sexual violence and sexual harassment, the ongoing proximity of the victim and alleged perpetrator will be considered immediately. For reports of rape and assault by penetration, the alleged perpetrator will be removed from any classes shared with the victim whilst the School investigates the matter and liaises with other agencies. The School will also consider how best to keep the victim and alleged perpetrator apart on School premises and on transport to and from School.
- There are four likely scenarios for the School to consider when managing reports of sexual violence and/or sexual harassment, but all should be underpinned by the principle that the School takes a zero tolerance approach to sexual violence and sexual harassment:
 - Manage internally: for example, where an incident of sexual harassment is a one-off;
 - Early help: providing support as soon as a problem emerges, at any point in a child's life (i.e. addressing non-violent harmful sexual behaviour and preventing the escalation of sexual violence);
 - Referral to children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger. At the point of referral the child's parents or carers will be notified unless there is a compelling reason not to; or
 - Report to the police (generally in parallel with a referral to children's social care): where there has been a report of rape, assault by penetration or sexual assault, even if the alleged perpetrator is under 10 years old.
- The School will consider a range of other options in dealing with incidents of sexual harassment or sexual violence depending on the seriousness and the circumstances of each case. These may include pastoral support and referrals to Child and Adolescent Mental Health Services (CAMHS). An alleged perpetrator may be

suffering from abuse as well as potentially posing a risk of harm to other children. The School will take advice from children's social care. The School will also where appropriate apply its Behaviour and Discipline policy and Exclusions policy. All decisions and actions should be regularly reviewed and policies updated to reflect lessons learnt.

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

Child sexual exploitation, child criminal exploitation and County lines

- Both child sexual exploitation and child criminal exploitation are a form of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into taking part in sexual or criminal activity 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.
- Child sexual exploitation is a form of child sexual abuse and can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. Child sexual exploitation can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge (for example through others sharing videos or images of them on social media). It can affect any child, including 16 and 17 year olds who can legally consent to have sex and who may believe they are in a genuine romantic relationship.
- A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Staff should consider whether some of the following signs may be indicators of sexual exploitation and refer suspected cases and complaints of sexual exploitation to the Designated Safeguarding Lead, keeping in mind that this list is non-exhaustive:
 - Children who appear with unexplained gifts or new possessions;
 - Children who have older boyfriends or girlfriends;
 - Children who suffer from sexually transmitted infections or become pregnant; and
 - Children who regularly miss school or education or do not take part in education.

- Child criminal exploitation is a geographically widespread form of harm that is a typical feature of county lines criminal activity (drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns), working in cannabis factories, shoplifting or pickpocketing. Perpetrators can trap victims by threatening the victim (and their family) with violence, entrapping and coercing them into debt. Staff should consider whether some of the following signs may be indicators of child criminal exploitation and refer suspected cases and complaints of criminal exploitation to the Designated Safeguarding Lead, keeping in mind that this list is non-exhaustive:
 - Children who appear with unexplained gifts or new possessions;
 - Children who associate with other young people involved in exploitation;
 - Children who misuse drugs and alcohol;
 - Children who go missing for periods of time or regularly come home late; and
 - Children who regularly miss school or education or do not take part in education.
- Staff should be aware that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however girls are at risk of criminal exploitation too. Both boys and girls being criminally exploited may be at a higher risk of sexual exploitation.
- Staff should be aware that county lines exploitation: can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Staff should make referrals to the Designated Safeguarding Lead where appropriate who may refer cases to the National Referral Mechanism.

Domestic abuse

- The Domestic Abuse Act 2021 (the “Act”) received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected”.
- Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

- Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between peers) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.
- Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
- Young people can also experience domestic abuse within their own intimate relationships. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.
- Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy. School staff can contact Operation Encompass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.
- The Designated Safeguarding lead will provide support according to the child's needs and update records about their circumstances.

Online safety

- It is essential that children are safeguarded from potentially harmful and inappropriate online material. Online safety will be taught to children and will be considered when planning the curriculum. The issues classified within online safety can be categorised as follows:
 - content: being exposed to illegal, inappropriate or harmful content (pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism);
 - contact: being subjected to harmful online interaction with other users (peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes);

- conduct: personal online behaviour that increases the likelihood, or causes, harm (making, sending and receiving explicit images and online bullying); and
 - commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If pupils, students, or staff are at risk, the Designated Safeguarding Lead where appropriate may refer cases to the Anti-Phishing Working Group.
- Mobile phones give many children unlimited and unrestricted access to the internet. All children must adhere to the School's Acceptable Use of IT Policy.
 - Appropriate filters and monitoring systems should be put in place on school devices and school networks to limit children's exposure to risks from the School's IT system, taking into account the number of and age range of the children, those who are potentially at greater risk of harm, and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
 - The School will:
 - identify and assign roles and responsibilities to manage filtering and monitoring systems
 - review filtering and monitoring provision at least annually
 - block harmful and inappropriate content without unreasonably impacting teaching and learning
 - have effective monitoring strategies in place that meet their safeguarding needs.
 - The appropriateness of the School's filters and monitoring systems will be informed by the Filtering and monitoring standards (March 2023), the Cyber security standards for schools and colleges (March 2023), and the risk assessment required by the Prevent Duty. In addition, the School should have in place appropriate levels of security protection procedures to safeguard the systems, staff and children, which will be reviewed periodically to keep up to date with evolving cyber-crime technologies.
 - The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Duty of staff, trustees and volunteers

- Children are more likely to report concerns to a trusted adult at the School. Children will be made aware that they may report concerns to a member of staff at any time.

- Every member of staff and trustee of the School as well as every volunteer who assists the School is under a general legal duty:
 - to protect children from abuse;
 - to be aware of the School's safeguarding procedures and to follow them;
 - to keep a sufficient record of any significant complaint, conversation or event but not to investigate the matter; and
 - to report any matters of concern to the Designated Safeguarding Lead.
- The Designated Safeguarding Lead will consult the LADO where appropriate on how to proceed. If the Designated Safeguarding Lead and two Deputy Designated Safeguarding Leads are exceptionally unavailable and a child is at risk of harm, a member of staff must refer them to children's social care and/or the police immediately.
- All staff are required to report to the Head teacher, or the Chair of Trustees, if it relates to the Head teacher, any concern or allegations of harming or posing a risk of harm to children. All concerns will be taken seriously. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.
- Pupils are taught to understand and manage risk through the School's curriculum and all aspects of school life. Pupils are reminded regularly about e-safety and must comply with our Acceptable Use of ICT policy and Anti-Bullying policy. Pupils are encouraged to speak to a member of staff in confidence about any concerns.
- The School has a policy for administering medicines. The School must ensure that there is a first aid box accessible at all times with appropriate content for children. The School must keep a written record of accidents and injuries and must inform parents on the same day or as soon as possible of any treatment given.
- The School's complaints procedure will be followed where a pupil or parent raises a concern about poor practice that initially does not reach the threshold for child protection action.

Procedures

- A member of staff suspecting or hearing a complaint of abuse:
 - must listen carefully to the child and keep an open mind;
 - must not ask leading questions, that is, a question which suggests its own answer;
 - must reassure the child that the allegation or complaint will be taken seriously, but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken;

- must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence;
 - must ensure that the child's wishes and feelings are taken into account when determining the action to take and services to provide;
 - must reassure the child that they are being taken seriously and that they will be supported and kept safe. The victim must never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and should never be made to feel ashamed for making a report;
 - must be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the Designated Safeguarding Lead if they have concerns; and
 - must determine how best to build trusted relationships with children and young people which facilitate communication.
- All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers), must be preserved. All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled.
 - All suspicion or complaints of abuse must be reported immediately to the Designated Safeguarding Lead or if the complaint involves a member of staff to the Head teacher. Details of procedures for reporting allegations against members of staff are set out separately below.
 - The action to be taken by the Designated Safeguarding Lead will take into account:
 - the local practice guidance of the Gloucestershire Safeguarding Children Partnership;
 - the nature and seriousness of the suspicion or complaint. Where a pupil is suffering or is likely to suffer from harm, referral to social care and if appropriate the police for a criminal offence must be made immediately;
 - the wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity. However, there may be times when the situation is so serious that decisions may need to be taken, after appropriate consultation, that override a pupil's wishes; and
 - the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests. It may be necessary, after appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead is concerned that

disclosing information to parents would put a child at risk, they will take further advice from the relevant professionals before making a decision to disclose any information.

- Whether or not the School decides to refer a particular complaint to social services or the police, the parents and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police and will be provided with contact names, addresses and telephone numbers, as appropriate.
- If an allegation of abuse is made against a pupil, our Behaviour and Discipline policy will apply and a pupil may be excluded from School. Staff will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil accused of abuse. The School will put in place support, for example, counselling where appropriate. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.
- A member of staff who suspects that a pupil is suffering abuse from outside the School should seek information from the child with tact and sympathy using open questions. A sufficient record should be made of the conversation on the report form which should be referred to the Designated Safeguarding Lead immediately.
- Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult social care and/or the police before discussing details with parents.

Staff Behaviour Policy

- All staff working at the School play an important part in keeping children safe. The School wants to promote a safe working environment for everyone on the school site. In order to keep themselves safe from possible allegations, staff must follow this advice:
 - Always set a good example by conducting yourself appropriately.
 - Always maintain appropriate standards of conversation with pupils, this includes language used in emails which should always remain professional.
 - Always use school equipment for schoolwork and personal equipment for personal use.
 - Always report any inappropriate behaviour from a pupil to the Designated Safeguarding Lead.
 - Always be aware that contact made outside of the School grounds with a pupil may be considered inappropriate and could lead to your interaction being misinterpreted.
 - Never give personal information to any pupil – for example your address, telephone or mobile phone number or email address.

- Never accept personal information from a pupil – for example their mobile phone number or email address.
- Never instigate or respond to physical contact with pupils unless it is appropriate to your role. If this occurs, then report it immediately to the Designated Safeguarding Lead.
- Never accept physical or verbal abuse from a pupil. Do not respond yourself but report it immediately to the Designated Safeguarding Lead.
- Never put yourself at risk working individually with pupils. Whenever possible, ensure that another adult knows where you are and be visible and/or audible (for example, open the door).
- Staff working with children must be aware of the risk of abuse by adults or other young people. If you have concerns about a child's safety:
 - Immediately inform the Designated Safeguarding Lead;
 - If it concerns a member of staff or volunteer then report it to the Head teacher or if it relates to the Head teacher to the Chair of Trustees; and
- Staff must follow the School's policies on Physical Contact with Students and Confiscation and Searching when dealing with incidents.
- Staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

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

- The School has procedures for dealing with allegations against staff (including supply staff and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from unfounded allegations. Some allegations might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the School (allegations that may meet the harms threshold):
 - behaving in a way that has harmed a child, or may have harmed a child;
 - possibly committing a criminal offence against or related to a child;
 - behaving towards a child in a way that indicates he or she may pose a risk of harm if he or she worked regularly or closely with children; and/or
 - behaving or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside of School).

- Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.
- Where an allegation or complaint is made against any member of staff or a volunteer, the matter should be reported immediately to the Head teacher or in his absence the Chair of the Trustees. The Head teacher will liaise with the Designated Safeguarding Lead and all allegations that appear to meet the criteria will be discussed with the LADO (within one working day) before further action is taken. Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Any doubts or concerns over apparently borderline cases will be discussed informally with the LADO, initially on a "no names" basis.
- Where an allegation is made against the Head teacher, the person receiving the allegation should immediately inform the Chair of the Trustees, or in his absence the Vice Chair, without first notifying the Head teacher. If an allegation is made against the Chair of the Trustees, the allegation should be reported to the Head teacher. Any such allegations will be discussed with the LADO (within one working day) before further action is taken.
- Where an allegation is made against a supply teacher the matter should be reported immediately to the Head teacher or in their absence the Chair of the Trustees. The Head teacher will liaise with the Designated Safeguarding Lead and all allegations that appear to meet the criteria will be discussed with the LADO (within one working day) before further action is taken. The School will fully involve the relevant agency and take the lead on any investigation and the supply teacher should be advised to contact their trade union representative if they have one, or a colleague for support. In no circumstances should the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.
- The Head teacher will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it. Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head teacher should not inform the accused or the parents until these agencies have been consulted and it has been agreed what information can be disclosed. The parents should be kept informed of the progress of the case, including the outcome of any disciplinary process in confidence. Parents should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing.
- A school has a duty of care towards its staff and as such, it must ensure that effective support is provided for anyone facing an allegation. A member of staff should be informed of allegations as soon as possible and given an explanation of the likely course of action, unless there are objections from external agencies. The member of staff should be advised to contact their trade union representative, if they have

one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the School. A representative will be appointed to keep the member of staff informed of the progress of the case and will consider whether other support should be made available.

- Where an investigation by the police or the local authority children's social care services is unnecessary, the LADO will discuss the steps to be taken with the Head teacher (or the Chair of the Trustees). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.
- It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the Head teacher or Chair of the Trustees, how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff but in some instances it may be appropriate to appoint an independent investigator.
- Suspension must not be an automatic response to an allegation and should only be considered in a case where:
 - there is cause to suspect a child or other children at the School is or are at risk of harm; or
 - the allegation is so serious that it might be grounds for dismissal.
- The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment. If there is no reasonable alternative to suspension and suspension is deemed appropriate, the reasons and justification for this will be recorded and the member of staff notified of the reasons.
- The School will consult with the LADO following the conclusion of any social care services investigation or criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the investigation or trial and the standards of proof applicable.
- If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and the provision of a mentor to provide assistance in the short term. The School will also consider how to manage any contact with the child who made the allegation.
- If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used. There will be a prompt and detailed report to the Disclosure & Barring Services as soon as possible if it is thought that the member of staff or volunteer has engaged in conduct that has harmed or is likely to harm a child; or has committed a relevant offence; or if a person has been removed from working in regulated activity or would have been

if they had not left. For teachers, a report must also be made to the Teaching Regulation Agency. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Board of Trustees without delay.

- If a member of staff or volunteer tenders their resignation any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the Disclosure & Barring Services, and for teachers, the Teachers' Regulation Agency, in appropriate circumstances.
- All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unfounded or malicious, the School will aim to resolve the matter within 1 week. It is expected that most cases of allegations of abuse against staff will be resolved within 1 month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head teacher will endeavour to institute appropriate action within 3 working days. If a disciplinary hearing is required and can be held without further investigation, we will aim to hold it within 15 working days.
- Where there is a lack of appropriate resource within the School, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator.
- Where the School receives an allegation relating to an incident that happened when an individual or organisation was using the School premises for the purposes of running activities for children, the School will inform the LADO and comply with the procedures set out in this Child Protection and Safeguarding Policy. The School will liaise with the organisation in respect of further steps to be taken where appropriate.
- Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head teacher will consider whether to take disciplinary action in accordance with the School's Behaviour and Discipline policy. Whether or not the person making the allegation is a pupil or a parent or other member of the public, the school reserves the right to contact the police to determine whether any action might be appropriate.
- Allegations that are unfounded (there was no evidence) not substantiated (there was insufficient evidence to prove or disprove), are false (sufficient evidence to disprove) or malicious (there was a deliberate act to deceive) will not be referred to in employer references. Substantiated allegations where there was sufficient evidence to prove the allegation must be referred to in employer references.
- On conclusion of the case, where the allegations is concluded to be either unfounded, malicious or unsubstantiated, the School will consider the facts and determine whether any lessons can be learned and if improvements can be made to procedure.
- Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of 10 years from the date of the allegation, if this is longer, unless the allegation was found to have been malicious, in which case it will be removed from the employee's records.

The record should include a clear and comprehensive summary of the concern, details of how the concerns was followed up and resolved, and a note of any action take, decisions reached and the outcome and a declaration on whether the information will be referred to in any future reference.

- In the case of an allegation against a member of teaching staff at the School, consideration will be made as to whether to refer the matter to the Teaching Regulation Authority. In addition, the School will make a referral to the Disclosure and Barring Service where it is considered that an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.
- Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the Disclosure and Barring Service.

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

- The section is based on 'Section 2: Concerns or allegations that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education 2023.
- 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.
- 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 children
- 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.
- We recognise the importance of creating a culture of openness, trust and transparency in which the School's values and expected behaviour are constantly lived, monitored and reinforced by all staff and all staff are encouraged to confidentially share low-level concerns so that they can be addressed appropriately. Therefore, concerns of low level conduct should be shared with the Head teacher, or the Chair of Trustees if the low level concern is in respect of the Head teacher. Staff should self-refer where they have found themselves, for example, in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they behaved in such a way that they consider falls below the expected professional standards.
- 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
- If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:
 - Directly to the person who raised the concern, unless it has been raised anonymously

- To the individual involved and any witnesses
- The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.
- Record keeping:
 - All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
 - Records will be:
 - Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
 - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
 - Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.
- We will not include low-level concerns in references unless:
 - The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
 - The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance
- If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head teacher will consult with the LADO and take a more collaborative decision-making approach.

Early Help

- Early help means providing support as soon as a problem emerges at any point in a child's life. Staff should identify emerging problems, liaise with the Designated Safeguarding Lead, share information with other professionals to support early

identification and in some cases undertake an early help assessment. Set out at Annex 1 are details of some of the early help offers provided by the School.

- If early help is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.
- All staff should be particularly alert to the potential need for early help for a child who:
 - is disabled and has specific additional needs
 - has special educational needs (whether or not they have a statutory education, health and care plan)
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is frequently missing/goes missing from care or from home
 - is misusing drugs or alcohol themselves
 - is at risk of modern slavery, trafficking, or exploitation
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
 - has returned home to their family from care
 - is showing early signs of abuse and/or neglect
 - is at risk of being radicalised or exploited
 - is experiencing, or is at risk of experiencing family ostracism
 - is a privately fostered child.
- Children's social care assessments should consider where children are being harmed in contexts outside the home, so the School must provide as much information as possible as part of any referral to local authority children's social care.

Safe recruitment practices

- At our School we endeavour to recruit staff with suitable qualifications and personal attributes for the vacancies available. The following system is followed when recruiting staff in order to safeguard children in our care.
- An advertisement is placed in The Times Educational Supplement, E Teach and/or local press giving a brief description of the post available and deadline dates. The person specification will set out details of qualifications, experience and any other requirements needed to perform the role in relation to working with children. The job description clearly states the main duties and responsibilities of the post and the individual's responsibility for promoting and safeguarding the welfare of children.

- The job application form requires the following:
 - applicants to provide their full identifying details including current and former names, date of birth, current address and National Insurance number
 - a statement of any academic and/or vocational qualifications the applicant has obtained that are relevant to the position for which they are applying with details of the awarding body and date of award
 - a full history in chronological order since leaving secondary education, with start and end dates, explanations for periods not in employment, education or training and reasons for leaving employment
 - a declaration of any family or close relationship to existing employees or employers (including trustees)
 - details of referees including one referee who is the applicant's current or most recent employer. If an applicant has worked with children in the past a reference from that employer should be included
 - a statement concerning whether the person is medically, physically and mentally fit to carry out the duties of the position for which they are applying and
- a statement concerning whether the person has any convictions, cautions or bind-overs.
- The job application form will include a copy of the school's Safeguarding policy.
- Two members of staff will carry out a shortlisting exercise. Shortlisted candidates will be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate will be asked to physically sign a hard copy of the application at point of interview.
- All applications will be scrutinised to ensure that they are properly completed and that the information provided is consistent and does not contain any discrepancies. The interview request will include the interview programme and require the applicant to bring with them original copies of their qualification certificates, passport, driving licence, birth certificate and utility bill showing the applicants current name and address.
- As part of the shortlisting process, the School will consider carrying out an online search as part of its due diligence on the shortlisted candidates to help identify any incidents or issues that have happened, and are publicly available online, which the School might want to explore with the applicant at interview. The School will inform the shortlisted candidates that online searches may be done as part of due diligence checks.
- Interviews will usually be conducted by two or more of the following people as required: Head teacher, Deputy Head teacher, Assistant Headteacher, HR Manager, Head of Catering, Head of Department or a member of the Board of Trustees. At

least one of the interview panel will be a member of staff who has been trained in safer recruitment.

- An offer of appointment to the successful candidate will be conditional upon the receipt of at least two satisfactory references, verification of the candidate's identity, verification of qualifications and satisfactory completion of the probationary period.
- The School follows the Department for Education's recommendations for the safer recruitment of staff who work with children. All members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff are subject to statutory child protection checks before starting work. All members, trustees, members of a local governing body, volunteer helpers, contractors working regularly during term-time, such as contract catering staff are also vetted. A supervised volunteer who regularly teaches children is not in regulated activity. An enhanced DBS certificate which includes a barred list check will be required for a member of staff who engages in regulated activity. For trustees and others not engaged in regulated activity, an enhanced DBS certificate without the barred list check should be conducted.
- The School will keep a single central record for staff, volunteers, members, trustees on whether the following checks have been carried out:
 - an identity check;
 - a barred list check;
 - an enhanced DBS certificate;
 - a prohibition from teaching check;
 - a section 128 check for management positions as an employee or trustee;
 - checks on people who have lived or worked outside the UK;
 - a check on professional qualifications; and
 - a check to establish the person's right to work in the UK.

Confidentiality and information sharing

- The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to identify and tackle all forms of abuse and safeguard and promote the welfare of children, including their educational outcomes. The School will co-operate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations in accordance with the requirements of Working Together to Safeguard Children 2018 and Information Sharing 2018. The School recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

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

Monitoring

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

- If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions should be taken:
 - The Designated Safeguarding Lead must carry out an investigation as a priority and comply with any deadlines given;
 - The Chair of the Trustees must report to the LADO or Ofsted on the findings of the investigation and set out any action to be taken; and
 - The School must endeavour to comply as soon as possible with any recommendations from the LADO or Ofsted.
- The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and will make an annual report to the Board of Trustees.
- The Board of Trustees will undertake an annual review of this policy. It will ensure that any weaknesses in regard to child protection arrangements are remedied without delay.

Data protection

- The content of this form will contain personal information which is subject to the provisions of the Data Protection Act 2018. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the School, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.
- The School will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.

Contact numbers

- The following telephone numbers may be useful:
 - ChildLine is a free confidential helpline for children: 0800 1111 www.childline.org.uk
 - The NSPCC: 0808 800 5000 www.nspcc.org.uk/kidszone
 - Ofsted's Whistleblower Hotline: 0300 123 3155.
 - The Samaritans: 08457 909090
 - Multi-Agency Safeguarding Hub (MASH): 01452 426565 childrenshelpdesk@gloucestershire.gov.uk
 - Operation Encompass: 01452 328953 halah.shamseldin@gloucestershire.gov.uk

*Reviewed and approved by the Trustees' Community and Wellbeing committee –
September 2023*

Next review – September 2024

Annex 1

KLB offer of early help

The School's offer of early help addresses the early identification of risk and the prevention of harm to students. Outlined below are some of the strategies, systems and procedures the School has in place to safeguard students around some specific aspects of safeguarding:

- Drugs screening and liaison with the Gloucestershire Drugs Agency staff
- Talks to Y9-13 from a drugs education therapist
- Talks to Y9-13 and parents delivered by a specialist
- Referring students to specialist support for bereavement provided by a member of staff who is Winston's Wish trained
- Support from a mental health nurse who work in school
- Full time parent support adviser
- Liaison with local GPs to support referrals to CYPS
- Full time Education Welfare Officer
- Liaison with family support services
- Liaison with police where welfare enquiries are required
- Police mentoring support for those presenting anti-social or criminal behaviour
- Use of the Gloucestershire CSE screening tool
- Support from the School's Parents' Support Adviser who offers individual support and runs parenting courses
- School internal agency and multi-agency meetings
- PSHE lessons covering mental health and substance abuse delivered by specialists who offer follow up support as needed
- Sixth Form buddy (TIC) support
- Feedback from the School Council Wellbeing group who raise issues affecting students across the school
- Signposting parents and students to agencies listed at the website: <http://www.glosfamiliesdirectory.org.uk/>
- Mapping of the PSHE curriculum against the PINK curriculum
- Designated Children in Care member of staff who is on the leadership team
- Chelsea's Choice, County Lines theatre and other workshops to deliver interactive sessions about CSE and sexting

- Police sessions for students and parents about sexting and safe use of the internet (Policebeat, Gloucestershire)
- Use of the Gloucestershire Healthy Living survey to identify patterns and coordinate intervention linked to demand
- Raise awareness by delivering assemblies and running projects linked the national anti-bullying week theme
- School Council Wellbeing sub-group (students) meets frequently with senior leaders
- Designated Safeguarding Lead has been trained to implement the Gloucestershire Encompass Model