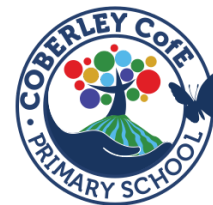


Safeguarding and Child Protection Policy

Written by: Andrew Milner, 14th September 2022, revised Sept 2023

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Every Child, Every Chance, Every Day

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INTRODUCTION

Coberley C of E Primary School fully recognises its duty and responsibility to consider the best interests of its pupils and to safeguard and promote the welfare of the children and young people in its care. Coberley acknowledges that safeguarding is everyone's responsibility and adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

This policy is prepared in accordance with the statutory guidance [Working Together to Safeguard Children](#) and the procedures and practices of the Gloucestershire Safeguarding Children Partnership ("GSCP"). This responsibility encompasses the following principles:

- To protect children from harm (maltreatment)
- To prevent impairment of children's mental or physical health and development

- To ensure that children are growing up in circumstances consistent with the provision of safe and effective care thus enabling those children to have optimum life chances and to enter adulthood successfully
- To treat the interests of our children as paramount (taking into consideration any special educational needs and disability ("SEND") or certain health conditions, their culture and their history)
- To consider at all times the best interests of the child

The governors approve this policy, which is reviewed annually by them. Coberley addresses its commitment to the above principles through:

Prevention - ensuring all reasonable measures are taken to minimise the risk of harm to children's welfare. These include:

- Ensuring Safer Recruitment practice*
- Ensuring through training that all teaching and non-teaching staff are aware of and committed to the Safeguarding Policy and Child Protection Procedures ("the Policy and Procedures") (including Child-on-Child Abuse Policy), Staff Code of Conduct (inc Whistleblowing Policy), and Behaviour and Anti-Bullying Policy
- Establishing a positive, supportive and secure culture in which children can learn and develop, together with a School ethos which promotes in all pupils a sense of being valued, listened to and respected
- Including in the curriculum, activities and opportunities for PSHE that equip pupils with the skills they need to stay safe from abuse and radicalisation which will help them develop realistic attitudes to the responsibilities of adult life. Also teaching of [Relationships Education, Relationships and Sex Education \(RSE\)](#). 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, and sexual violence/harassment.
- Providing pastoral support that is accessible and available to all pupils and ensuring that pupils know to whom they can talk about their concerns. Ensuring pupils understand what safeguarding is and how it is there to protect them, not criminalise them

(*The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School while deterring and preventing people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities, within the School. Please refer to separate policies and guidance for full details; this guidance will follow the Independent Schools Standards Regulations and comply with guidance with regard to the Disclosure and Barring Service ("DBS"). Members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, undergo full pre-employment child protection checks prior to starting work, including an enhanced DBS check and, where applicable, disqualification by association (Child Care Act 2006)).

Protection – ensuring all appropriate actions are taken to address concerns about the welfare of a child or children, working to agreed local policies and procedures in full partnership with other local agencies, especially the Police and Children's Social Care (Safeguarding Children Joint Chief Inspectors' Report Department of Health, October 2002). These include:

- Sharing information about concerns with agencies who need to know and involving children and their parents/carers appropriately (including Children's Social Care, the Police, the Local Authority Designated Officer ("LADO") and in "Prevent" with the Channel process)

- Any member of staff can refer to the LADO or Children's Social Care; however it is the expectation that the Designated Safeguarding Leads ("DSLs") are the primary communicators with LADO and Children's Social Care as appropriate. They will contact the LADO and local safeguarding partner arrangements within 24 hours of a disclosure or suspicion of abuse, although if there is risk of immediate harm this contact must be immediately
- The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Gloucestershire's LADO can be contacted on 01452 426994
- Monitoring children known or thought to be at risk of harm and to contribute to assessments of need and support packages for those children

Safeguarding, in addition to child protection, encompasses issues such as student health and safety, bullying/cyber-bullying, appropriate medical provision, and drug and substance misuse. These have specific policies and guidance, which should be read in conjunction with this document.

Operation Encompass Commitment

Operation Encompass helps police and schools work together to provide emotional and practical help to children (Annex B, Keeping Children Safe in Education 2023). As part of Coberley School's commitment to keeping children safe we have signed up to implement the principles and aims of the Gloucestershire Encompass Model.

In signing up to Gloucestershire Encompass the Governing Body/Proprietor and Senior Leadership Team:

- Endorse the Gloucestershire Encompass Model and support the Key Adults in our school to fulfil the requirements of the Gloucestershire Encompass Protocol.
- Promote and implement Gloucestershire Encompass processes and use these in accordance with internal safeguarding children processes.
- Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection

MANAGING SAFEGUARDING AND CHILD PROTECTION

Roles and Responsibilities

Staff

All staff including volunteers and supply teachers have a statutory obligation to report to the DSL, or DDSL (preferably via CPOMS) if there is suspicion of abuse of a student, if a student discloses abuse or allegations of abuse or if there is any indication that a child is being abused by somebody. In addition, any members of staff may refer a concern to The Gloucestershire Multi-Agency Safeguarding Hub ("MASH"), Community Social Work Team or the LADO themselves if they feel it necessary or appropriate.

Contact details for key external and internal contacts can be found at Appendix VI.

[When to call the police \(NPCC\)](#) – Guidance for schools and colleges.

This is an inescapable, personal, and professional responsibility of all staff and volunteers for the protection of children from harm

All staff need to have read and understood and be able to discharge their responsibilities as set out in Keeping Children Safe in Education (“KCSIE”) 2023 and with due reference to The Prevent Duty 2015 and Working Together to Safeguard Children 2018 Guidance. For those staff that do not work directly with children, they will be required to read and understand Annex A of KCSIE 2023. All other staff will be required to read and understand at least Part 1 of KCSIE 2023.

Staff could have their suspicion or concern raised in a number of ways, the most likely of which are:

- the conduct of a member of staff
- a child, parent or member of staff ‘disclosing’ abuse or suspected abuse
- evidence of physical hurt or deterioration in mental health that may or may not be accompanied by unusual or uncharacteristic behaviour by a child.

The following individuals have specific roles and responsibilities under Child Protection Procedures that are outlined below:

Governors

It is an essential feature of good governance that responsibility is not delegated to others without first ensuring reliable mechanisms for monitoring and evaluation of policy implementation. Governors (as displayed on the School’s website) have ultimate and collective responsibility for ensuring pupils’ wellbeing, which encompasses safeguarding. Their responsibilities include:

- assessing the safeguarding risks that might arise from the School’s operations;
- ensuring that the School has a Policy and Procedures known to all staff and governors, that are in accordance with Local Authority and inter-agency procedures, and that these are made available to parents on request;
- ensuring that staff are competent, supported and regularly reviewed in relation to safeguarding;
- carrying out a review of this Policy and these Procedures annually in the Autumn term;
- approving the School’s Annual Safeguarding Audit and submitting these to the local safeguarding partner arrangements;
- undertaking monitoring to ensure effective implementation of the Policy and Procedures through:
 - i. an annual presentation (September INSET) from the DSLs and through informal and on-going discussion with staff which must cover staff training; the steps being taken to listen to pupils; any referrals to children’s services (anonymised) in respect of the promotion of welfare; any referrals to the LADO in respect of staff/volunteers; and specific themes arising from these or elsewhere in the School and steps taken as a result;
 - ii. enquiry of staff about their knowledge of the Policy and Procedures;
 - iii. ensuring that staff have received regular safeguarding training (and that e-safety training for staff is considered as part of the overarching safeguarding approach);

- iv. ensuring governors receive appropriate safeguarding and child protection training at regular intervals to enable them to assess the effectiveness of the School's procedures and policies.
- approving the DSL and DDSLs job descriptions which include the key activities of the role;
- ensuring that they know how children are taught about safeguarding, including online safety, through the curriculum and PSHE;
- ensuring that the School's senior teachers are also aware of local safeguarding procedures and the School's safeguarding obligations.

The School's DSL reports to the governors and has delegated responsibility for scrutiny of the Annual Safeguarding Audit and the Policy and Procedures to their submission to the Safeguarding governor.

Nominated Governor

Cassie Smith (from June 2023) is the **Nominated Governor** for Safeguarding and Child Protection at Coberley. Her responsibilities include:

- On behalf of the governors, carrying out detailed monitoring of the implementation of the Policy and Procedures (including an annual review of sample entries in the Single Central Register);
- Maintaining close and regular contact with the DSLs;
- To deal with any allegation of abuse made against the headteacher;
- Working with the DSLs to review the Annual Safeguarding audit (now KSCIE declaration), judge the efficiency with which procedures have been implemented and to report on this to the governing board.

The **Nominated Governor** for Safeguarding and Child Protection can be contacted through the Clerk, **Mrs Julie George** admin@coberley.gloucs.sch.uk or telephone 01242 870366.

Designated Safeguarding Lead

Mr Andrew Milner is the Headteacher of Coberley and is the DSL.

His responsibilities include:

- ensuring that the Policy and Procedures approved by the governors are understood and fully implemented by all staff;
- ensuring that the roles of DSL and DDSL are filled by individuals with appropriate qualifications and experience and given significant prominence in the School community;
- ensuring that Department for Education ("DfE") guidance is followed to ensure safe staff recruitment and that adequate staff checks and records are maintained.

The Deputy Designated Safeguarding Leads (DDSLs) is Mrs Julie George email admin@coberley.gloucs.sch.uk.

Coberley also has an arrangement to use Mrs Sue Harding (DSL at Birdlip Primary School) as an additional DDSL if required – email sharding@birdlip.gloucs.sch.uk

During term time, the DSLs will usually be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL is not available in person, the DDSL should

be approached. For out of hours/out of term activities, the School's arrangements are to use the headteacher's mobile as the first point of contact.

The School will support the DSL and DDSLs in developing their knowledge and skills to understand the views of children, including encouraging a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

For DSL job descriptions: See Appendix I

Ethos of the School

The School is a place where:

- All individuals are respected, and their individuality is valued
- Students are encouraged to achieve
- Self-discipline is promoted and good behaviour is the norm
- Rewards and disciplinary penalties (sanctions) are applied fairly and consistently

The School's policies seek to reflect the highest moral standards. In particular, bullying and other anti-social behaviour will not be tolerated. As a school founded on Christian principles, the School recognises that pupils make mistakes and that pupils who do so should be able to make reparation where reasonably possible. The School understands that problems are likely to have underlying causes and the School will seek to take account of these and help address any underlying issues.

The School ensures that it has systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback. The School operates its processes with the best interest of its pupils at heart.

Awareness, Training and Support

Any member of staff can refer to the LADO or Children's Social Care (The MASH or Community Social Work Team); however, it is the expectation that the DSL and DDSL are the primary communicators. They will contact the LADO and local safeguarding partner arrangements within 24 hours of a disclosure or suspicion of abuse.

Together, the DSL and DDSLs hold the following responsibilities:

Raising Awareness

- to take lead responsibility for all safeguarding and child protection matters arising at the School, including online, and to support all other staff in dealing with any child protection concerns that arise
- to maintain an overview of safeguarding within the School
- to have the status and authority within the School to carry out the duties of the post including committing resources and, where appropriate, supporting and directing staff to safeguard and promote the welfare of children
- promoting and safeguarding the welfare of children and young persons for whom they are responsible and with whom they come into contact. This includes liaising with the Mental Health Support Team where safeguarding concerns may be linked to mental health

- to monitor and review annually, liaising with the governors, the effectiveness of the Safeguarding Policy and Child Protection Procedures to ensure that they comply with current best practice
- to ensure parents have access to the Safeguarding Policy and Child Protection Procedures which alerts them to the fact that referrals may be made and explain the role of Coberley in this to avoid later conflict. Available on the School website and a hard copy is provided on request or from reception
- to ensure, where necessary, records are passed on to subsequent schools.
- to have good links and working relationship with the local safeguarding partner arrangements and LADO/Police (if a criminal matter) so that staff are aware of local policies and training opportunities and keep staff aware of child protection procedures.

Training and Support

All staff will receive the yearly interim Child Protection and Safeguarding update from the DSL /Head at the beginning of each academic year (or when they join mid-year), as well as a three-yearly longer update of any changes within Child Protection and Safeguarding nationally and locally, often delivered by an external Safeguarding expert. Training will include online safety and harmful sexual behaviours (including child-on-child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.

The DSL will ensure that:

- policy and procedures are set and updated at least annually, and are complied with throughout the School
- the School's own practices and concerns about welfare and safeguarding matters are regularly reviewed. This includes the personal and professional duty of all staff to report welfare/safeguarding concerns to a DSL, or in the absence of action, directly to Children's Services
- all staff understand the role of the DSL and DDSL
- all staff, including governors, receive and read at least Part 1 KCSIE 2023 and appropriate confirmation of this is recorded and mechanisms are in place to assist staff to understand and discharge their roles and responsibilities as set out in Part 1 (and Annex B as appropriate)
- Each time Part 1 of KCSIE 2023 is updated by the DfE, staff are updated on the changes via staff meeting minutes.
- all staff receive the Staff Code of Conduct behaviour policy, anti-bullying policy and safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, covered in the Missing Pupil Policy (CME Policy)
All staff receive online safety training, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring the Internet.
- the DSLs undertake either local safeguarding partner arrangements training or national training and undertake regular updates once every two years as a minimum to include inter-agency working, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the GSCP's approach to Prevent duties, and harmful sexual behaviours, plus any additional training to remain compliant with new guidance and legislation

- Child Protection training is managed and delivered to all staff who work with children, and records are kept of this training. Any new legislation or updates will be communicated to staff on a regular (at least annual) basis either electronically or through Inset (or both)
- all new staff, including governors, temporary staff and volunteers, are provided with induction training that includes:
 - Coberley's Safeguarding and Child Protection Policy, which includes information on Child-on-Child Abuse, Whistleblowing Procedure, and Prevent Duty
 - **the Staff Code of Conduct, the School's acceptable use of technologies policy (including Social Media guidance)**
 - the identity and role of the school's DSL and DDSLs
 - a copy of at least Part 1 KCSIE 2023 (and Annex B as appropriate)
 - Technology Policy, which includes safe use of Social Media and E-Safety **including safe filtering and monitoring of the Internet.**
 - the behaviour policy, anti-bullying policy, including cyberbullying, prejudice-based and discriminatory bullying);
 -

Copies of the above documents are on all the school's shared drive and are sign-posted to all staff during induction.

The chair of governors will ensure that 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.

The governors are 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 ECHR Convention.

Referrals

- to communicate immediately with the local safeguarding partners arrangements, (including Children's Social Care, the DBS and the Police) whenever an allegation or disclosure is made (current or historical). The School does not have any threshold for referrals. It always directs all allegations to Children's Social Care
- to have sound knowledge of the different forms of abuse and a clear understanding of the possible physical and behavioural indicators and know when it is appropriate to make a referral to **Children's Social Care (Gloucestershire MASH 01452 426565)**
- to ensure all staff, particularly the SENCO, are prepared to identify children who may benefit from [Gloucestershire Early Help](#). Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years
- to ensure that in all cases of actual or alleged harm to a student, the Local Authority Safeguarding Procedures are followed. This will involve contacting the LADO, should the allegation be against a member of staff, otherwise referring to Children's Social Care. The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Gloucestershire's LADO can be contacted on 01452 426994

- to act as a focal point for liaison with Children's Social Care and other authorised agencies, ensuring that full and prompt sharing of information is provided at the time of referral and that the referral is confirmed in writing under confidential cover
- to act as a source of support, advice and expertise within School on matters of Child Protection and welfare
- to ensure that clear, detailed written records of welfare concerns about pupils are on CPOMS and any paperwork is kept secure and in a locked location
- to refer cases where a crime may have been committed to the Police as required. [When to call the Police \(NPCC\)](#)
- to refer cases where a person is dismissed or leaves the School due to risk/harm to a child to the DBS as required.

This needs to be carried out in order to inform relevant agencies of any allegations of serious harm or abuse of any person living, working or looking after children at the School premises (whether that allegation relates to harm or abuse committed on the School premises or elsewhere), or any other abuse which is alleged to have taken place on the School premises and of the action taken in respect of these allegations. The School will endeavour to report any allegations or concern as soon as possible but definitely within seven days.

For those children who have need of additional support or input from external agencies the School will work with local processes and procedures.

Organisations or Individuals using school premises

If the school allows an external organisation, including the school's PTA (FOCS) to use the school, it is essential that Safeguarding protocols are put in place and agreed upon by the school. Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

'WHISTLEBLOWING' PROCEDURE / CONCERNS ABOUT SAFEGUARDING PRACTICES IN SCHOOL

All staff (including governors, supply staff, agency staff and volunteers) should be aware of their duty to raise concerns, where they exist, about the management of Child Protection in School, which may include the attitude or actions of colleagues. The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'.

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head in the first instance. Where there are concerns about the Head, this should be referred to the Chair of Trustees. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the LADO.

If the member of staff reporting suspicions remains unsatisfied by a decision not to act by the Heads and/or the DDSL, or where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, they should raise this concern in accordance with the School's **Whistleblowing Procedure** and may also report concerns directly to Children's Social Care. He or she will be considered to have acted as a responsible citizen and will not be

held accountable for undermining a School decision. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

The phone number for referral – Gloucestershire MASH – is 01452 426565

Where a staff member or volunteer feels unable to raise an issue with the School or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them; see Whistleblowing Policy.

The NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00PM, Monday to Friday and Email: help@nspcc.org.uk

See link: [NSPCC Whistleblowing Advice Line](#)

CHILD PROTECTION PROCEDURES AND GUIDANCE (INCLUDING TYPES OF ABUSE) What is Safeguarding?

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

What is Child Protection?

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

What is Significant Harm?

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

Scope and Purpose of these Procedures

These procedures apply to the Governors and all staff (including supply and peripatetic staff), agency staff and volunteers working for and on behalf of Coberley and explain what action should be taken if there are concerns that a child is or might be suffering harm. A child is a person under 18 years but the principles of these procedures apply also to vulnerable young adults over 18 years.

What Constitutes Child Abuse?

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. [What to do if you're worried a child is being abused](#). The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for. 'What school staff should look for' can be found in Paragraph 19 of Keeping Children Safe in Education 2022

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. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. They may be abused by an adult or adults, or another child or children. Please consider that an abuser could also be female. Children may be abused in a family (e.g. witnessing domestic violence) or in an institutional community setting by those known to them, or more rarely by others (e.g. via the internet). Abuse can take place wholly online or technology may be used to facilitate offline abuse.

Staff in the School are alert to the possible indications or signs of possible abuse, which may include:

- Signs of looking unwashed, undernourished, weight loss etc; inappropriate clothing for the conditions
- Changes in behaviour – depression or withdrawn behaviour or attention seeking behaviour
- Fearful behaviour - fear of specific people places, fear of separation etc.
- Mentioning being left alone or unsupervised
- Regressive or aggressive behaviour e.g. bed-wetting or severe temper outbursts that are out of character
- Mood swings
- Changes of friendship group
- Persistent or multiple bruising in unexpected places, that cannot be explained by normal childhood activity
- Minor injuries in unlikely places
- Burns, scalds or bites
- Delay in seeking access to medical care/treatment
- Excessive preoccupation with sexual matters
- Knowledge of sexual matters inappropriate for age of child
- Promiscuous behaviour
- Sexually explicit or otherwise disturbing creative writing or artwork
- Expression of opinions that are at odds with the School's shared values, and which may be tantamount to, or explicitly inciting violence and/or illegal acts.

The above list is by no means exhaustive, and it is important to be aware that there may be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the Section DSL, who will discuss the matter with the DSL and through them, as necessary, to Children's Social Care. Such cases may also be referred to the School's Health Centre and through them to Children's Social Care. Staff are well advised to look beyond the setting - what is happening in other areas of the child's life?

See Appendix II for definition and more detail of the following types of abuse:

- Emotional abuse
- Neglect
- Sexual abuse and sexual harassment
- Domestic abuse
- Physical abuse
- Child-on-Child abuse
- Female Genital Mutilation ("FGM")

- So-called 'Honour Based' Abuse (including forced marriage)

Appendix II also contains further information regarding the following specific safeguarding concerns:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Sharing of nudes and/or semi-nudes
- Upskirting
- Serious violence
- Cybercrime
- Modern Slavery
- Homelessness
- Children missing education
- Child abduction and community safety incidents
- Children and the court system
- Children with family members in prison

Concerns regarding any of the above safeguarding issues should be reported using the procedures set out in this policy. Alternatively, staff should first discuss their concerns with the DSL or DDSL who will consider the appropriate course of action. Staff should not assume that someone else will act; safeguarding is everyone's responsibility.

CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff, but especially the DSLs, should consider the context within such incidents and/or behaviours occur and 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) CSE, CCE, domestic abuse in their own intimate relationships (teenage relationship abuse), radicalisation and serious youth violence. This is known as 'contextual safeguarding', which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, and therefore it is important that the School provides as much information as possible to Children's Social Care as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse to enable consideration of all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

As a school we also need to be mindful of local environmental safeguarding issues which may arise such as county lines, gang culture and we will be alert to this through ongoing training and through liaising with GSCP.

EARLY HELP

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years (Early Help).

Any child may benefit from Early Help but all staff should be particularly alert to the potential need for

Early Help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- 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 or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal 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
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing, family ostracism
- Is at risk of 'honour-based abuse' such as FGM or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education, including persistent absences for part of the school day.

Staff vigilance may identify children who may not reach external agencies' thresholds for intervention but still need help to protect and promote their welfare in and out of school. In the first instance, staff who consider that a student may benefit from Early Help should discuss this with the DSL or DDSL. They will consider the appropriate action to take in accordance with local procedures. Information can be found at the following link [Gloucestershire Levels of Intervention Guidance, 2021](#)

The DSL or DDSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If Early Help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

Concerns Regarding a Student's Mental Health

The School has an important role to play in supporting the mental health and wellbeing of its pupils. All staff should also be aware that 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose

behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff have access to a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE's [Mental health and behaviour in schools guidance](#).

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the usual safeguarding procedures set out in this policy or by speaking to a DSL or DDSL in the first instance.

Preventing Radicalisation of a Student

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Further information regarding radicalisation, extremism and terrorism, including definitions, can be found at Appendix II.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. Staff should follow the School's normal safeguarding referral processes where there are concerns about children being drawn into terrorism, by discussing the matter with DSL or DDSL.

Radicalisation and violent extremism could cause harm or have the potential to cause harm to the child and others. Under the Prevent Duty (2015) the School will report in line with the recommended policies and procedures to the local safeguarding partner arrangements through the MASH and the local Police force (Tel: 101) to speak to Prevent Officer. The Counter Terrorism Police website [Act Early](#) is [helpful](#). The DfE dedicated telephone number for non-emergency advice for staff and Trustees is 020 7340 7264 and the email is: counter-extremism@education.gsi.gov.uk.

Risk of Serious Violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries, or unexplained gifts or new possessions which could indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

If staff have concerns about a child (as opposed to the child being in immediate danger) they should, where possible, speak to a DSL or DDSL to agree a course of action, although staff can make a direct referral to Children's Social Care if necessary.

Discovered Cases of FGM

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out on a student. Unless the member of staff has good reason not to, they should still consider and discuss any case with a DSL or DDSL and involve Children's Social Care as appropriate. Staff are referred to Appendix II of this policy for more information on FGM, including the procedures to be followed where a child is suspected to be at risk of FGM.

Incident of Nudes and Semi-nudes being shared by Students

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media, gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL or DDSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- Carrying out interviews with the children involved (if appropriate)
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform the parents and carers should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If it is determined that the child has not been harmed and is not at risk of immediate harm, the incident can be handled in the School in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE 2023 and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they

should notify the DSL or the DDSL immediately, who should always inform the Police as a matter of urgency.

Children with Special Educational Needs

Children with Special Educational Needs and Disabilities (SEND) and certain health conditions can face safeguarding challenges and are three times more likely to be abused by their peers. Staff need to be aware of additional barriers that these children face, such as communication barriers (including reporting concerns and abuse), that they may be disproportionately impacted by behaviours such as bullying without displaying symptoms and assumptions that indicators of possible abuse such as behaviour, mood, injury relate to the child's disability without further explanation.

There is a concern sometimes that, for children with SEND, their SEND needs are seen first, and the potential for abuse second. The EHA (Early Help Assessment) Tool should be used where the root causes of abuse may be underlying and beyond SEND issues and behaviour.

Looked after Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. When it becomes necessary, the School shall follow statutory guidelines and ensure all staff are appropriately trained.

Staff have a duty to be responsible in promoting the welfare of pupils at all times and to take action to safeguard their welfare.

Key points:

- Be vigilant
- Listen to children
- Observe changes in attitude or behaviours
- Respond to specific concerns at any early stage – self-harming, depression, eating disorders etc.
- Report any concerns to the appropriate designated professional
- Do not conduct any own investigations but contact relevant agencies who will have the authority to do so
- Be prepared to whistle blow if you have any concerns about the conduct of volunteers of colleagues in respect of their handling of children
- Be open to the potential of child-on-child abuse
- Understand the potential for "grooming"

Children Missing from Education

A child going missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues including abuse, neglect, sexual abuse, CSE, and/or CCE (including county lines), or mental health problems. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in

the future. The appropriate safeguarding procedures will be used for children who go missing from school, particularly on repeat occasions. Staff are aware of potential triggers such as travelling to conflict zones, FGM, forced marriages etc.

The CME (Missing Pupil) Policy ensures that all measures are taken to monitor attendance and provide guidance to all staff when a student is missing from school. In addition, Coberley is cognisant of the 'Statutory guidance on children who run away and go missing from home or care' - January 2014 and Working Together to Safeguard Children 2018 and all matters of this type are referred to the DSL or DDSL.

Coberley will hold more than one emergency contact for each child, with two being the expected level of contact including phones and emails wherever possible.

If a child is failing to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more, then the local authority will be notified of the absence.

The local authority will be notified when a student is deleted from the admission register / school register. This will be acted upon as soon as the grounds for deletion are met, but no later than deleting the student's name.

Safeguarding Concerns for Children who Move School or 'Disappear'

If we become aware that a UK based child is missing from education (CME), in whatever capacity, and we need to check their educational status, we should make enquiries with the Access to Education Team at Gloucestershire County Council. They can be contacted at:

Access to Education Team
Shire Hall
Westgate Street
Gloucester GL1 2TP
Tel 01452 328774 / 426015
missingpupils@gloucestershire.gov.uk

Link to school CME advice and referral form:

[Children Missing Education and Missing pupils
Gloucestershire School CME Referral Form](#)

In addition, the UK Visa and Immigration service will be informed in line with Tier 4 Student Sponsor procedures where appropriate.

See the link below for further guidance:

[Children missing education - Statutory guidance](#)

Children with a Social Worker

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSLs will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorized absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children who identify as LGBTQ+

Children who identify as LGBTQ+ or who are questioning their sexuality are not necessarily more likely to be victims of harm. However, they may find it more challenging to speak openly about their experiences and 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. It is important for the School to promote an open and inclusive culture. Allies for equality and diversity in the School will be clearly identifiable and able to provide a safe space, virtual or otherwise, for LGBTQ+ pupils to share their concerns.

PROCEDURES FOR DEALING WITH ALLEGATIONS OF CHILD-ON-CHILD ABUSE (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child-on-child abuse is abuse by one or more children against another child or children. It can be standalone or as part of wider abuse and can happen both inside and outside of the School, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sharing nudes and semi-nudes, sexual assault, gender-based issues and sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

All staff must maintain an attitude of 'it could happen here'. When there are reports of child-on-child abuse the DSL or DDSL will meet with appropriate staff following advice from Children's Social Care and coordinate the matters in line with guidance from GSCP. The DSL or DDSL will:

- Follow procedure and refer to the MASH Team
- Ensure secure supervised spaces for all involved
- Involve the other DSLs as appropriate
- Follow guidance above with respect to each student in a secure supervised environment
- If a student appears injured and/or distressed in anyway then medical attention may need to be received

Practical and up to date support and information can also be found on [NSPCC](https://www.nspcc.org.uk) or via the www.gov.uk website

If there is an allegation against a person outside the School community, the DSL or DDSL will seek advice from external agencies and contact the parents as and when appropriate.

Please see the separate Child-on-Child Abuse Policy for the School's procedures in managing allegations and incidents of child-on-child abuse. The Child-on-Child Abuse Policy applies to all reports and concerns of child-on-child abuse, whether they have happened in School or outside of it, and/or online.

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE BY A MEMBER OF STAFF (INCLUDING SUPPLY STAFF, GOVERNORS, VOLUNTEERS AND CONTRACTORS)

It is important to draw a distinction between complaints and allegations against staff (including volunteers, agency staff and supply staff). In other words, the difference between behaviours that suggest misconduct or unprofessionalism (which should be dealt with under the School's complaints procedure and disciplinary procedure), and those which specifically raise child protection concerns (which should be dealt with using the procedures below).

The School's procedures for managing allegations against staff (including supply staff, and volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows the DfE's statutory guidance and the Gloucestershire Safeguarding Children Partnership's arrangements and applies when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children including behaviour that may have happened outside of school.

Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out below.

If an allegation is made against anyone working with children in the School, then the quick resolution of that allegation will be a clear priority as this is a benefit to all concerned. Any unnecessary delays should be eradicated. The Head should be informed at the earliest opportunity. Before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School will not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

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. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Social Care and the Police.

Any concern which involves the possibility of physical, emotional or sexual abuse will always be referred within 24 hours to the LADO and their advice taken prior to any internal investigation in school. The DSL is responsible for ensuring the child is not at risk. If child protection procedures are needed, an investigation will be carried out by Children's Social Care and the Police.

If an allegation is made against a member of staff, the School will apply common sense and judgement, it must be responded to quickly, fairly and consistently and with the utmost discretion to ensure protection for the child and support for the person who is the subject of the allegation. The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

The informant should be told that the matter will be referred in confidence to the appropriate people. This must be done and the written record put on CPOMS the same day to the DSL and/or Head. The circumstances should be kept strictly confidential until the relevant Head has been able to judge whether or not an allegation or concern indicates possible abuse. The Head will discuss the concerns with the LADO for allegations management ([Role of the LADO & the Allegations Management process](#)) and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the Head deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the Head should contact Children's Social Care and as appropriate the Police immediately.)

Where the DSL is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to Children's Social Care. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed.

Allegation management flow chart: [Allegations Management Flowchart](#)

Allegation management referral form: [Allegation Management Referral From.](#)

If it is decided by the LADO that an investigation is called for, a Strategy Meeting will be called by a Manager or the LADO at GSCP. This would normally involve the Police, Children's Social Care or the LADO, and the DSL. The arrangements agreed upon will include informing the parents and seeking their consent for any immediate medical examination.

If the allegation made to a member of staff concerns a Head, the person receiving the allegation will immediately inform the Chair of Governors, without prior notification to the Head. If the allegation concerns a DDSL then the Head must be informed.

If the allegation is made against a volunteer, a supply teacher, contractor etc, an investigation will necessarily involve the organisation or agency of employment. For those who are self-employed the allegation will be passed directly to GSCP or LADO for advice or action, dependent upon whom the allegation is made against.

When to inform the individual who is subject to the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the Police and/or Children's Social Care. Subject to any objection, the person who is the subject of the allegation will normally be informed as soon as possible after the result of the initial investigation is known, or the decision is made to dispense with one, but the individual will not be invited to make a response at this stage.

They will be given an explanation of the likely course or action, and given the details of a named representative within the School to keep the individual informed of the progress of the case. There should be a warning that anything said will be recorded. The School will also consider what other support is appropriate for the individual.

Where further enquiries are required to enable a decision about how to proceed, the LADO should discuss with the relevant DSL how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

Where initial discussions lead to no further action, the relevant DSL and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

The Head will give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered before suspending a member of staff:

- 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 to alternative work in the School so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted, or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The School will give due weight to the views of the LADO, Working Together to Safeguard Children and KCSIE 2023 when making a decision about suspension (including with respect to considering alternatives). If the police decide to take the case further, the member of staff implicated would normally be suspended or, where the circumstances are considered to warrant it, dismissed. It is reasonable to ask the police to give some indication of their timescale. Where the individual is suspended, the School will confirm the decision within one working day, and will ensure the individual is aware of who their point of contact is in the School and shall provide them with their contact details. The Head will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

The Head will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from Children's Social Care or the Police. Parents and

others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

The Head will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

The School will discuss with the LADO whether a referral to the DBS or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). Advice about whether an allegation against a teacher is sufficiently serious to refer to TRA can be found at: [Teacher misconduct: the prohibition of teachers](#)

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE 2023 and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references.

If an allegation is shown to be deliberately invented or malicious, the relevant DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the School's Behaviour Policy; or whether the Police should be

asked to consider if action might be appropriate against the person responsible even if they are not a student.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Charity Commission's guidelines deem it appropriate to do so.

On conclusion of the case, the School will review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the Head (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

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 DBS.

Arrangements for Dealing with Safeguarding Concerns or Allegations of Abuse About Supply Staff and Contracted Staff

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will 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 School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative, if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies. Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the TRA).

Record Keeping

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, will be kept on the confidential personnel file and will

be retained until the member of staff reaches retirement age, or for a period of 10 years after the allegation has been made. The School will provide information regarding an allegation for the purposes of future references and DBS disclosures.

Good Practice Recommendations for Record Keeping will involve:

- Ensuring that a proper record is kept of any Child Protection referral and action taken, and that this is kept securely and in confidence
- Child Protection records should be kept for the approved timescale for the various Authorities the School works in conjunction with and then shredded on the basis that this information has been shared with Children's Social Care who will continue to hold copies
- Preference is to send over CPOMS record, which any paperwork scanned and attached, but if there are paper notes dispatched to another school, we must ensure that the original copies are held and that photocopies are dispatched with notes and records of delivery i.e. special delivery / recorded delivery
- New children have their old school approach to transfer any child protection files securely and also a proactive approach to ensuring sufficient support and cascading of information in place for key staff.

Low level Staff Concerns or Allegations (that do not meet the harms test) About Teachers and Other Staff (including the Head, Governors, Supply Staff, Volunteers and Contractors)

A low-level concern is any concern 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 LADO.

'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

For concerns regarding staff (including the Heads, Governors, supply staff, volunteers and contractors) that do not meet the harms threshold should be dealt with using the School's Low Levels Concerns Policy in Appendix III of this policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

STATEMENT ON CONFIDENTIALITY

The management of confidentiality is an essential factor in all issues relating to Child Protection. The only purpose of confidentiality with respect to Child Protection is to benefit the child.

Staff should never give pupils or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know.

It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, will continue to be harmed. Advice should be sought from the DSL or DDSL 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 DSL will balance the victim's wishes against their duty to protect the victim and other children.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information or where there is another lawful basis to do so (UK GDPR, Data Protection Act 2018). Wherever appropriate, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or be in the best interests of the child, for example, where safety and welfare of that child necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

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
- not providing pupils' personal data where the serious harm test is met.

POLICY ON SAFEGUARDING AND ICT

Safeguarding and ICT Guidelines

Protecting young people in the online world means thinking beyond the School environment. With the advance of Internet technology, pupils will increasingly have access to personal devices not covered by School network protection and the School recognises that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) . The School's emphasis therefore is on educating all users as to the risks involved and their obligation to act responsibly whilst online, both inside and outside of the School.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Safeguarding pupils in both the real and virtual worlds is the responsibility of all staff. Staff and the governors must be familiar with these guidelines and understand how to respond to online incidents, even when online at home. Staff need to be vigilant for threats of radicalisation on line as well as cyber bullying, grooming, online abuse or any other safety issues. Students will be taught through the curriculum including PSHE and other pastoral support systems how to behave and build resilience in dealing with such matters.

All pupils should be made aware of the Pupil Acceptable ICT Use Policy and what to do if they have any ICT safeguarding concerns. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse, some SEND children or children with certain health conditions might be needed.

The school's filtering and monitoring systems will be informed, in part, as required by the Prevent Duty. To support this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- 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

Governing bodies and proprietors should review the standards and discuss with staff and service providers what more needs to be done to support the schools in meeting this standard.

Online safety is revisited regularly through the PSHE and in Computing lessons for all pupils.

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.

Procedures for dealing with inappropriate/illegal internet access or material

Coberley has installed robust web filtering software which will be kept under review to ensure the protection of its pupils whilst accessing the Internet. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

It is recognised however that no software is infallible, and the following procedures will be abided by where necessary. These systems will also be reviewed periodically by Governors to ensure they understand the system that is in place and staff are aware how to escalate concerns

Discovery of inappropriate websites, by staff or pupils, should be reported immediately to the DSL, who will consider referral to [Child Exploitation and Online Protection command](#) and the Police.

Illegal material accessed within the School is a very serious situation and must always be reported to the Police. Any incident that involves inappropriate adult access to legal material on the School's premises will be dealt with by the School's disciplinary policy, in conjunction with the Police where appropriate.

Action in the Event of Discovery of Illegal Material:

- seek immediate and specific advice from the DSL or DDSL who will consult with relevant parties including the Police
- prevent any further access to the device/network location until the correct advice is gained
- **unless absolutely necessary, DO NOT delete the material or remove the power from a working device and under no circumstances start a device if it is already switched off**
- Consider if it is necessary to prevent remote access to the device
- If it is believed that a member of staff or student who has left the site, could remove or damage evidence on the device remotely, unplug ONLY the network cable from the back of the device to prevent this access from occurring, ideally consulting with the headteacher before doing so
- If the device is already turned off and it is no longer realistically possible to prevent further physical access (i.e. due to lack of supervision, high levels of access or an unoccupied location) disconnect the power at the base unit (not the wall) and remove the laptop. Store this device securely in a location where no one else can gain access to it and make a note of the date, time and name of the individual who performed this action.

Under no circumstances should any member of staff attempt to conduct an investigation of their own or bring in an outside expert to do so as this may compromise the evidence if a legal case were to result. In some cases, this may constitute a criminal offence in itself.

Further information regarding Safeguarding and ICT can be found in Annex C of [Keeping Children Safe in Education \(September 2023\)](#)

GUIDANCE ON SHARING NUDES AND SEMI-NUDES

Details of how the School responds to incidents of sharing nudes and semi-nudes can be found at the following link:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

POLICY ON KEEPING STAFF SAFE

Coberley is committed to ensuring that relationships between staff and pupils are conducted on a professional basis. Anticipation of possible risks and seeking to prevent all reasonable risk of misunderstandings and false allegations are seen as part of this commitment.

Good practice includes valuing and respecting children as individuals and the adult modelling of appropriate conduct – please refer to the Staff Code of Conduct. **It is recognised that it is the action rather than the intention that may subsequently give rise to problems.**

It is important for all staff (including Governors, supply staff, agency staff and volunteers) to:

- Comply with the Staff Code of Conduct at all times
- be mindful of safe working practices and alert to situations which may present risks and manage these
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- empower children – discuss with them their rights and responsibilities, what is acceptable and unacceptable, and what they can do if there is a problem.

Staff (Including Governors, Supply Staff, Agency Staff and Volunteers) Must Never:

- hit or otherwise physically assault children
- develop relationships with children which could in any way be deemed exploitative or abusive
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative
- condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
- discriminate against, show differential treatment, or favour particular children to the exclusion of others
- touch a child in a way which may be considered unless there is a justifiable reason
- do anything of a personal nature for a student that he/she can do for him/herself
- indulge in horseplay, tickling or other games involving physical contact

Staff Must:

- avoid inviting pupils (groups or individuals) to their homes unless there is a good reason and it has been approved by the Head.
- not give pupils their home address, home telephone number, mobile telephone number, or email address
- not give a student a lift in their own vehicle other than on school business and with permission from the Head

This is not an exhaustive list and we are mindful that many of the staff team have children at the school and therefore share home details for their children.. The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour or be open to misinterpretation. The Staff Code of Conduct contains further information about the standard of appropriate behaviour of staff at the School.

If a member of staff believes that an action could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard, the member of staff should self-refer and record the incident and circumstances in writing on CPOMS as soon as possible, using the Safeguarding category. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

EARLY YEARS FOUNDATION STAGE (EYFS) – ADDITIONAL SAFEGUARDING ARRANGEMENTS

Disqualification From Working in Childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment, Selection and Disclosures Policy & Procedure

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Duty to Notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the School premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

APPENDIX I – JOB DESCRIPTIONS

SAFEGUARDING JOB DESCRIPTION FOR DESIGNATED SAFEGUARDING LEAD and DEPUTY DESIGNATED SAFEGUARDING LEAD

Job description for the role of the Designated Safeguarding Lead at Coberley C of E Primary School:

Title: Designated Safeguarding Lead (DSL) for Child Protection
Named person: Andrew Milner
Responsible to: Governors

Title: Designated Safeguarding Lead (DSL) for Child Protection
Named person: Julie George
Responsible to: DSL / Governors

The Designated Safeguarding Lead (DSL), Headteacher of Coberley C of E has a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post. Whilst deputies can carry out delegated activities, the ultimate lead responsibility remains with the designated safeguarding lead. The lead responsibility cannot be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's
- social care as required;
- support staff who make referrals to local authority
- children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners
- liaise with the DDLs to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- work closely with the School Business Manager to ensure all processes and procedures with regard to safeguarding and safer recruitment are in place and adhered to;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENDCO or the named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulations;
- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to

- the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and school leadership staff. The role could include ensuring that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- **take the lead in online safety by understanding and being responsible for the filtering and monitoring systems and processes in place.**

Child protection file

Where children leave the school (including for in-year transfers) ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and SENDCO.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) is available (during school hours) for staff in the school to discuss any safeguarding concerns.

If the Headteacher is not on site, it is deemed acceptable that the designated deputy safeguarding lead would be expected to be available in person. In exceptional circumstances availability via phone and or Google MEET or other such media is acceptable.

A partnership agreement between Coberley ensures that the DSL or DDSL from both schools can be contacted.

During holiday times, the DSL can be contacted either by head@coberley.gloucs.sch.uk or mobile phone.

APPENDIX II – TYPES OF ABUSE AND SPECIFIC SAFEGUARDING CONCERNS

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with a DSL.

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 DSLs, 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.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to a DSL.

Physical Abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse involves physical injury to a child, where there is definite knowledge or reasonable suspicion that injury was deliberately inflicted or was not prevented. Giving a child poisonous substances includes inappropriate drugs and alcohol. Physical abuse, as well as being a result of an act of commission, can also be caused through omission or the failure to protect, as well as forced marriages and FGM.

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that

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

Sexual Abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Serious bullying may be regarded as emotional, sexual or physical abuse and will be considered under Child Protection Procedures.

Sexual Harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the School. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the Gov.uk Sexual Violence and Sexual Harassment advice.

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.

Child-on-Child Sexual Violence and/or Harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Further information can be found in the DfE's Sexual Violence and Sexual Harassment advice.

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.

Sharing of Nudes and/or Semi-Nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

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

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

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with

children and young people" sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Domestic Abuse Act 2021 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, based on the previous cross-government definition, 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" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. 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 Compass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse.

Child Exploitation: Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other

resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males, females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CCE: CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or
- for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or
- through violence or the threat of violence.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines – see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

CSE: CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship).

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development, or become pregnant.

See Annex B of:

- [Keeping Children Safe in Education \(September 2023\)](#)
- [Child sexual exploitation: definition and guide for practitioners \(February 2017\)](#)
- [What to do if you suspect a child is being sexually exploited \(2012\)](#)
- [Child sexual exploitation](#)

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

County Lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher

educational institutions, student referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

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

Serious Violence: All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from

school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these. Advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Specific Safeguarding Issues: behaviours linked to drug taking, alcohol abuse, truanting and sharing nudes or semi-nudes put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sharing nudes or semi-nudes and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); FGM; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sharing inappropriate images; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims May 2022)"

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, a DSL, should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where

young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

Mental Health: all staff should be aware that 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to a DSL.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

So-called 'Honour Based' Abuse: Honour based abuse encompasses crimes which have been committed to defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. See Annex B of [Keeping Children Safe in Education \(September 2022\)](#). Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Female Genital Mutilation (FGM): 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 with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. To give an example of indications that a girl has already been subjected to FGM:

- A student may have difficulty walking, sitting, or standing and may even look uncomfortable
- A student may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating

- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the student's return
- A student is reluctant to undergo medical examination

There is however 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, can be found in Annex B: Further information, of [Keeping Children Safe in Education \(September 2022\)](#) and pages 38-41 of the Multi-agency statutory guidance on FGM

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). Teachers have a statutory duty to personally make a report to the police (in addition to liaising with a DSL) where, in the course of their professional duties, **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with a DSL and involve Children's Social Care as appropriate.

For the purposes of the duty, the relevant age is the girl's age at the time of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases, you should follow local safeguarding procedures.

To make a report it is recommended that the person does it orally by calling 101, the non-emergency number. However, where there is a risk to life or likelihood of serious immediate harm, then it should be reported immediately to police, including dialling 999 if appropriate. Reports should be made within 24 hours ideally. Further guidance can be found at the following link:

[Mandatory reporting of female genital mutilation: procedural information](#)

If staff are unsure whether the statutory reporting duty applies, or if they have a concern that a student may be at risk of FGM, or if the girl is over 18, they should speak to a DSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities,

for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk.

Radicalisation, Extremism and Terrorism: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. The DSLs and other senior leaders in the School should familiarise themselves with the Prevent Duty guidance: for further education institutions in England and Wales. Staff should contact a DSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school. For example, information that would allow the new school or to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Students with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with a DSL as appropriate.

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

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a student may be at risk of homelessness they should talk to a DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who Go Missing From School: A child going missing from School is a potential indicator of a range of safeguarding issues including abuse, or neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who go missing can be found in the School's Missing Pupil Policy. All unexplained absences will be followed up in accordance with the School's Missing Pupil Policy.

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority of any student who fails to attend school regularly or has been absent without

the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child Abduction and Community Safety Incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the Court System: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with Family Members in Prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX III - LOW LEVEL CONCERNS POLICY

A 'Low Level Concern' is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of Coberley may have acted in a way that:

- is inconsistent with our **Staff Code of Conduct**, including inappropriate conduct outside of work; and
- does not meet the harm threshold set in KCSIE 2022 or is otherwise not considered serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO (on a no-names basis if necessary).

The School takes all concerns about safeguarding seriously. The purpose of this 'Low Level Concerns' procedure is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour which are set out in the **Staff Code of Conduct** are lived, monitored and reinforced constantly by all staff.

The aim of the Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of staff so as to not place pupils or staff at risk of harm or of allegation of harm to a student. All staff are expected to comply with the standards contained within this Staff Code of Conduct at all times.

A 'low-level' concern does not mean that it is insignificant. A 'Low-Level Concern' is any concern – no matter how small, and even if it does no more than give a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of Coberley may have acted in a manner which does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO (on a no-names basis if necessary) and which:

- is inconsistent with the School's Staff Code of Safe Practice, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that member of staff's suitability to work with children.

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the School; or as a result of vetting checks undertaken.

Staff do not need to be able to determine in each case whether their concern is a 'Low-Level Concern', or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Once staff share what they believe to be a low-level concern, that determination should be made by the Head. The Head is the ultimate decision-maker in respect of all low-level concerns although it is recognised that the Head may wish to consult with the DSL and take a more collaborative decision-making approach. The LADO can be contacted on a no-names basis for advice to

establish if it meets the threshold for their involvement. The LADO contact details are 01452 426994. Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing or electronically and stored securely. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for seven years from the date of the low-level concern or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

APPENDIX IV - CHILDREN ACT SECTIONS 17 AND 47

Section 17

17 Provision of services for children in need, their families and others.

[Children Act 1989 - Section 17](#)

Section 47

47 Local authority's duty to investigate.

[Children Act 1989 - Section 47](#)

APPENDIX V – RELATED DOCUMENTS

- Keeping Children Safe in Education 2023 [Teaching Online Safety in School - June 2019](#)
- [Working Together to Safeguard Children – \(dated July 2018 but update 2020\)](#)
- [Disqualification Under the Childcare Act 2006 - August 2018](#)
- [Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents And Carers - July 2018](#)
- [Promoting the Education of Looked After Children And Previously Looked After Children](#)
- [Statutory Guidance for Local Authorities - February 2018](#)
- [Prevent and Tackling Bullying – July 2017](#)
- [Children Missing Education – September 2016](#)
- [The Use of Social Media for Online Radicalisation -July 2015](#)
- [Mental Health and Behaviour in Schools – November 2018](#)
- [Counselling in Schools: A Blueprint for the Future – February 2016](#)
- [Teacher Misconduct: The Prohibition of Teachers - October 2015\)](#)
- [Mandatory Reporting of Female Genital Mutilation- Procedural Information - January 2020](#)
- [Teacher Misconduct: Information For Teachers – September 2018](#)
- [Revised Prevent Duty Guidance for England And Wales – HM Government – April 2021](#)
- [Children Missing Education: Statutory Guidance for Local Authorities – September 2016](#)
- [What To Do If You Are Worried That A Child Is Being Abused – March 2015](#)
- [Sexting in Schools and Colleges: Responding To Incidents And Safeguarding Young People: UK Council For Child Internet Safety](#)
- [Regulated Activity in Relation to Children: Scope](#)
- [UK Safer Internet Centre: Appropriate Filtering and Monitoring](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)
- [When to Call the Police \(NPCC\)](#)
- [Child Sexual Exploitation: Definition and Guide for Practitioners](#)
- [Preventing and tackling bullying - July 2017](#)
- [Mental Health and Behaviour in Schools - November 2018](#)[Safeguarding and Protecting People of Charities and Trustees – Charity Commission – October 2019](#)

- [Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People – December 2020](#)

Related School Documentation

For the policies, please see here:

- Behaviour Policies
- Equal Opportunities Policy
- EYFS documentation
- Health & Safety Policy
- Technology Policy
- CME (Missing Pupil) Policy
- SEND Policies
- Pastoral Policy
- Staff Code of Conduct

Further local safeguarding partner arrangements documents can be found on <https://www.gloucestershire.gov.uk/gscp/>

The Safeguarding Policy and Child Protection Procedures will be reviewed at least annually and in the light of statutory changes and after any child protection concern.

APPENDIX VI – useful CONTACTS

Children's helpdesk (also known as 'The Front Door')	
If you are worried or concerned about anyone under 18 who you think is being abused or neglected, or that a child and their family need help and support, please contact the MASH hours: 9am - 5pm If you have a concern about a child or young person that is non-urgent and you wish to have a conversation to consider levels of intervention and next steps with a community social worker, please can you send an email to:	01452 42 6565 and select option 3 or childrenshelpdesk@gloucestershire.gov.uk mashearlyhelp@gloucestershire.gov.uk
Out of office hours	

Outside of office hours, you should contact the Emergency Duty Team (EDT) or, if you have concerns about the immediate safety of the child or you believe a serious criminal offence has been committed please contact the Police at any time on 101 or 999	01452 61 4194 or 101
To report a concern about a professional working with children (Allegations Management)	
Nigel Hatten, LADO (Local Authority Designated Officer) nigel.hatten@gloucestershire.gov.uk	01452 42 6994
Safeguarding Training	
For questions about Multi-agency & single-agency training courses contact the Adult Education Team	01452 58 3863 or adedsafeguardingcourses@gloucestershire.gov.uk
For specific training advice or queries contact Izzy Dougan, Safeguarding Training Coordinator	01452 58 3621 or isobel.dougan@gloucestershire.gov.uk
More information	
To understand the procedures involved once a concern has been raised please read our Child Protection Procedures	https://www.gloucestershire.gov.uk/gscp/traded-services-for-educational-settings/safeguarding-in-education/
For local information about different types of violence and abuse and how to protect against it with links to local, practical support and help	Gloucestershire Take a Stand Website

