

RAGLAN PRIMARY SCHOOL



CHILD PROTECTION & SAFEGUARDING POLICY

Raglan Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Safeguarding is everyone's responsibility.

Staff responsible:	Head Teacher & Safeguarding Team
Date of review:	September 2026
Reviewed by:	Head Teacher (All Trust / DFE updates completed July and September 2026.)
Date of next review:	September 2027

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Mr M De Freitas	Raglan Primary School safeguardingteam@raglan.bromley.sch.uk
Deputy DSLs	Mrs D Mead Mr M Hunter Mrs S Collins Mrs E Ingrey Miss R Ezinwa Mr L Farmer	T: 0208 460 6558
Wrap Around Care DSLs	Mrs C Carberry Before School Club Mrs E Prescott After School Club	Raglan Primary School safeguardingteam@raglan.bromley.sch.uk T: 0208 460 6558
Local authority designated officer (LADO) Bromley Kent	Gemma Taylor	020 8461 7669 (via Bromley Safeguarding Children's Board) lado2@bromley.gov.uk (general enquiries) lado@bromley.gcsx.gov.uk (secure email) Local Authority Designated Safeguarding Lead (LADO) Team contact LADO 03000 410888 kentchildrenslado@kent.gov.uk
Local authority designated safeguarding officer (LADO)	Gemma Taylor	See above
Safeguarding Link Governor	Dr J Reed	headofgovernance@mslt.org.uk
Safeguarding Trustee	Marie Powell	mariepowell@mslt.org.uk

All statutory definitions in this policy were reviewed and updated in July 2026 to ensure full alignment with Keeping Children Safe in Education (KCSIE) 2026. Where wording has been clarified or updated in the statutory guidance, this policy reflects those changes.

1. Roles and Responsibilities

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

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

- › Behaviour Policy
- › Online Safety Policy
- › AI Policy
- › Planned programme of relationships, sex and health education (RSHE & SRE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

The Board of Trustees has an overarching role in ensuring that policies, procedures and training in MOSAIC schools are effective and comply with the law at all times. The Trust's over-arching statement on Safeguarding and Child Protection is available on the website (www.mosaicschoolslearningtrust.org), but it is the responsibility of all schools within the Trust to develop their own policy to encompass the Trust's ethos.

The Local Governing Boards (LGB)

The Governing Boards will:

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

- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a-link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- › Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - The DSL takes lead responsibility for understanding the filtering and monitoring systems and process in place in school
 - Online safety and AI is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - All staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply teachers, trainee teachers and all contracted staff). Appendix 3 of this policy covers this procedure
 - That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
 - The school has appropriate filtering and monitoring systems in place and review their effectiveness (See Appendix 10)
 - The DfE's filtering and monitoring standards are reviewed, and discussed with IT staff and service providers about what needs to be done to support the school to meet these standards – the school uses IT Managed Service Provider and LGfL Senso filtering service
 - All staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
 - The leadership team and staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- › Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

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

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

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

Designated Safeguarding Lead (DSL)

The DSL is a senior member of staff from the leadership team who is appointed to take lead responsibility for safeguarding and child protection, including online safety. This person has the appropriate status and authority within the school to carry out the duties of the post. The DSL is responsible for managing referrals, working with other agencies, raising awareness, and ensuring staff training and policy implementation relating to safeguarding. The DSL is available during school hours for staff to discuss any safeguarding concerns.

The DSL will:

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

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- › Contribute to the assessment of children
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Have a good understanding of harmful sexual behaviour
- › Have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- › Keep the headteacher informed of any issues
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- › Keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program

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

The DSL is supported by a Safeguarding Team which includes a Senior Strategic Leadership Safeguarding Team comprising of: the DSL, Mrs Mead and Mrs Collins. The DSL also has six Deputy Designated Safeguarding Lead (DDSL). During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Each Deputy DSL has responsibility for a phase in the school.

EYFS: Miss Ezinwa

KS1: Mrs Ingrey

Lower KS2: Mrs Mead (DHT)

Upper KS2: Mr Farmer

SEND and SaLT Provision: Mr Hunter (AHT)

When the DSL is absent, the deputies will act as cover. At Raglan Primary School, we have

- A confidential shared mailbox safeguarding@raglan.mslt.sch.uk
- Monitoring by the DDSLs using CPOMS during DSL absence
- Named deputies and their contact details (see Key Contacts section)

BASC have trained DSLs and Deputy DSLs and have access to the school Safeguarding Team at all times. If the Safeguarding Team are not available, the BASC and Holiday Club DSLs will act as cover. The Children and Family's Hub Team (Bromley) or Integrated Children's Services (Kent) or the Out of Hours Team or Childline can be contacted in event of a member of staff being uncontactable.

Head Teacher

The Head Teacher must ensure that there is DSL in post and must ensure that up-to-date records relating to Child Protection are kept. These include:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation
- Communicating this policy to parents when their child joins the school and via the school website (add school links)
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met where applicable, for example the ratios specific to early year's provision.
- Ensuring that each child in the EYFS is assigned a key worker (this will be the class teacher in Reception classes).
- Overseeing the safe use of technology, mobile phones and cameras in the early years setting.
- Making decisions regarding all low-level concerns, although they may wish to collaborate with the DSL on this

Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others. Bromley's Virtual Head details can be seen in the Contacts section above. The role of the Virtual School Headteacher is to promote the educational outcomes of children in care, previously in care, and children with a social worker, ensuring they achieve their full potential.

All staff

All staff will be given a copy of this Policy in September 2026 and on joining Raglan Primary School, and will electronically sign to confirm that they have read and understood the Policy and agree to follow it. All staff will read and understand Part 1 of the Department for Education's statutory safeguarding guidance in its entirety, [\(Keeping Children Safe in](#)

[Education 2026](#)), and review this guidance at least annually. All staff will sign a declaration at the beginning of each academic year to confirm that they have reviewed the guidance.

Staff will reinforce the importance of **online safety** when communicating with parents/care givers. This includes making parents/care givers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

Staff will '**create a culture**' where pupils can speak out or share any concerns with them. Staff will provide a safe space for pupils who are LGBT to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the staff Code of Conduct and the role of the designated safeguarding lead (DSL) and deputies, the **Behaviour Policy**, the **Online Safety Policy**, **AI Policy**, the **Mobile Phone Policy** and the safeguarding response to children who go missing from education.
- The **targeted family early help level process** and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The **process for making referrals** to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they **identify a safeguarding** issue or a child tells them they are being abused or neglected, including specific issues such as **FGM**, **harmful sexual behaviour or sexual violence**, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The **signs of different types of abuse, neglect and exploitation**, including stalking, financial, domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as **Child-on-Child abuse (including harassment and violence)**, grooming, child sexual exploitation (**CSE**), child criminal exploitation (**CCE**), indicators of being at risk from or involved with **serious violent crime**, **FGM** and **radicalisation**, and **serious violence** (including that linked to county lines) and these are rarely stand alone and often overlap
- New and emerging threats, including online harm including AI- generated content such as deep-fakes, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- **Previously looked after children** who potentially remain vulnerable. All staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after

children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

- **Young Carers** and how to identify and support them
- The importance of **reassuring victims** that they are being taken seriously and will be supported and kept safe.
- The fact that children can be at **risk of harm** inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (**LGBT**) can be targeted by other children

That a cautious approach should be taken for **gender questioning-children**, considering the broad range of the individual's needs in partnership with their parents / care givers as a matter of priority (except in rare circumstances where involving parents / care givers would bring a significant risk of harm to the child). There should be regard for any clinical advice that is available and consider how to address wider vulnerabilities, such as the risk of bullying

- What to look for to **identify children** who need help or protection
- **Children not feeling ready or knowing** how to tell someone that they are being abused, exploited, or neglected. They may not recognise their experiences as harmful, and may feel embarrassed, humiliated, or may be being threatened. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.
- That a child and their family may be experiencing multiple needs at the same time

See below for more detail on how staff are supported to do this.

Volunteers

Volunteers and work experience students who work in MOSAIC schools will have training on Child Protection issues, be vigilant and understand the processes to report any concerns to a member of staff. A member of the Safeguarding Team will carry out this training (see also Appendix 2).

2. Aims

We aim to ensure that:

- Appropriate action is taken in a **timely manner** to safeguard and promote children's welfare
- All staff are aware of their **statutory responsibilities** with respect to safeguarding
- Staff are properly **trained in recognising and reporting** safeguarding issues
- All staff are aware of how **GDPR regulations** operate alongside sharing safeguarding information with other agencies.

We will be succeeding when:

- All staff have received appropriate training in child protection issues and procedures, including online safety.
- All staff throughout the academic year will have Prevent training and FGM training and are alert to the signs and who to contact.
- All staff receive safeguard updates when necessary and termly update emails regarding Prevent, FGM and Private Fostering.
- When all staff receive Online-Safety training and understand potential serious violence linked to county lines.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Trust may put in place to protect them.
- All child-protection concerns are dealt with promptly and recorded appropriately (with secure digital recording via CPOMS).
- Information is promptly and carefully assessed and passed to relevant statutory agencies.
- All staff are provided with **Parts 1** of Keeping Children Safe in Education (DfE 2026) and are aware of specific safeguarding issues.
- All DSLs undergo formal child protection training every two years (in line with LCSB) and receive regular (annual) safeguarding refreshers (e.g. via e-bulletins) Ensuring that children are taught about safeguarding in an age appropriate way (in-line with DfE 2026 guidance).
- Appropriate filters and appropriate monitoring systems are in place to safeguard children from potential harmful and inappropriate online material, and staff understand their expectations, roles and responsibilities in relation to these. The DSL has responsibility for understanding the systems in place in school. (See Appendix 10)
- All staff know the process to make a referral to social care and to seek the support of the DSL or DDSL if the DSL is unavailable.

- All staff will have Cyber-Security Training and Unconscious Bias Training
- We create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- All staff are aware of escalating a concern and adhere to the Mosaic Whistleblowing Policy.
- All staff will have emergency first-aid training and staff working in EYFS will have nominated paediatric first aid trained staff watching children as they eat.

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2026\)](#), [Working Together to Safeguard Children \(2026\)](#) and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children's board, which includes what contextual safeguarding is and implications on children.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#), and [Childcare Act 2006](#) which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- [General Data Protection Legislation 2018](#) & The Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025
- [Teaching Online Safety in School 2019](#) this guidance from the DfE outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head Teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- [Working Together to Improve School Attendance](#) includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns
- This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

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

4. Definitions

Safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems

emerge

- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of 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.

Child protection is part of this definition and refers to activities undertaken to prevent specific children who are suspected to be suffering, or being likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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.

Making of nudes or semi-nudes, including where generated by AI is where children share nude or semi-nude images, videos or live streams. This includes pseudo-images that are computer generated.

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

Children includes everyone under the age of 18, including babies.

Victim Whilst 'victim' is a widely understood and recognised term, not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. We will use any term the child feels most comfortable with when managing an incident

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms, however we use the term "**instigator**" as in some cases, abusive behaviour can be harmful to the instigator too. We will decide what's appropriate and which terms to use on a case-by-case basis

The following **three safeguarding partners** are identified in KCSIE (2026) and defined in the Children's Act 2004, as amended by chapter 2 of The Children and Social Work Act (2017). They will make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs:

- Bromley LA/ Kent LA/Croydon LA
- Bromley CCG
- Chief of Police

5. Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked-after, or have previously been looked after
- Are missing from education for prolonged periods and/or repeat occasions
- Whose parent/care giver has expressed an intention to remove them from school to be home educated

6. Confidentiality

It is important that all staff and volunteers feel confident that they will be supported if they have to deal with a safeguarding issue. It is also vital that the confidentiality of parents and caregivers and pupils is respected. Staff will be mindful that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025 and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category data' the DPA 2018 contains 'safeguarding of children and individuals at risk as a processing condition that allows practitioners to

share information without consent if it not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

- The government's information sharing advice for safeguarding practitioners includes [7 golden rules for sharing information](#) (see appendix 7), and will support staff who have to make decisions about sharing information

- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm, or withholding will impinge the support or progress of a child

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests

- Confidentiality is also addressed in this policy with respect to record-keeping, see below, and allegations of abuse against staff in Appendix 3

- Egress or password document, will be sent for children with safeguard concern

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

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

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

- The DSL should consider that:

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

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

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

› Regarding anonymity, all staff will:

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

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

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- › The government's **guidance regarding the new Information Sharing Duty** includes guidance for sharing information, and will support staff who have to make decisions about sharing information
- › If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- › Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

Staff, governors and trustees should use the DfE's data protection guidance for schools to help you:

- Comply with data protection law
- Develop data policies and processes
- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches

7. Recognising abuse and taking action

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

- › Is disabled
- › Has special educational needs (whether or not they have a statutory education health and care plan)
- › Is a young carer
- › Is bereaved
- › Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- › Is frequently missing/goes missing from education, care or home
- › Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- › Is at risk of being radicalised or exploited
- › Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- › Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- › Is misusing drugs or alcohol
- › Is suffering from mental ill health
- › Has returned home to their family from care
- › Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage

- › Is a privately fostered child
- › Has a parent or carer in custody
- › Is missing education, or persistently absent from school, or not in receipt of full-time education
- › Has experienced multiple suspensions and is at risk of, or has been permanently excluded from schools, colleges and in alternative provision or a pupil referral unit

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

8. If a child is in immediate danger

A referral will be made to Bromley/Croydon /Kent children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL/DDSL as soon as possible if you make a referral directly. A referral direct to the local authority can be made at:

<https://www.bromley.gov.uk/children-families/reporting-child-abuse>

[Bromley LSCB - Home](#)

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

<https://kccchildrens.kent.gov.uk/web/portal/pages/supporttypeprofessional>

or via the NSPCC website at:

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/>

9. If a child makes a disclosure to you

If a child discloses a safeguarding issue to you including non-recent abuse, you should:

- Always take the disclosure seriously
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret. Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Teaching staff will record on CPOMS and inform the DSL or safeguarding team of the record. **IF SUPPORT STAFF ARE NOT USING ELECTRONIC SYSTEM**: Support Staff, Administrators, Visitors (inc supply staff), site-team and volunteers will record using the form in Appendix 8
- Sign and date the write-up and pass it on to the DSL or member of the safeguarding team **immediately**. Return to the safeguarding team within 24 hours to ensure that you are notified of action and have access to emotional support if required See Appendix 8
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (and tell the DSL as soon as possible that you have done so

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful

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

All children should feel supported and kept safe, and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

10. If you discover that FGM (Honour or faith-based abuse)- has taken place or a pupil is at risk of FGM

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

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

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

Any teacher who either:

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

or

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

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

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

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out [if relevant, insert: or discovers that a pupil aged 18 or over appears to have been a victim of FGM] should speak to the DSL and follow our local safeguarding procedures.

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

Signs that should always be a cause for concern may be changes such as:

- Difficulty concentrating and not doing as well at school
- Becoming withdrawn
- Mood or behaviour changes, for example:
 - Becoming more irritable
 - Being angry
 - Aggressive behaviour
 - Clinginess
 - Attention-seeking behaviour
 - 'Acting out'
 - Tiredness
 - Mental health needs, for example, signs of depression, anxiety, eating disorders or post-traumatic stress disorder (PTSD)
 - Self-harming
 - Risk-taking behaviour, for example:
 - Stealing
 - Bullying

- Running away
- Sexual activity
- Trespassing or vandalism
- Fighting
- Truancy
- Using drugs or alcohol, especially if they didn't before

*Remember: be **professionally curious**. If you see something that doesn't feel right, no matter how small, report it to the DSL.*

12. Flowchart of Actions where there are Concerns about a Child

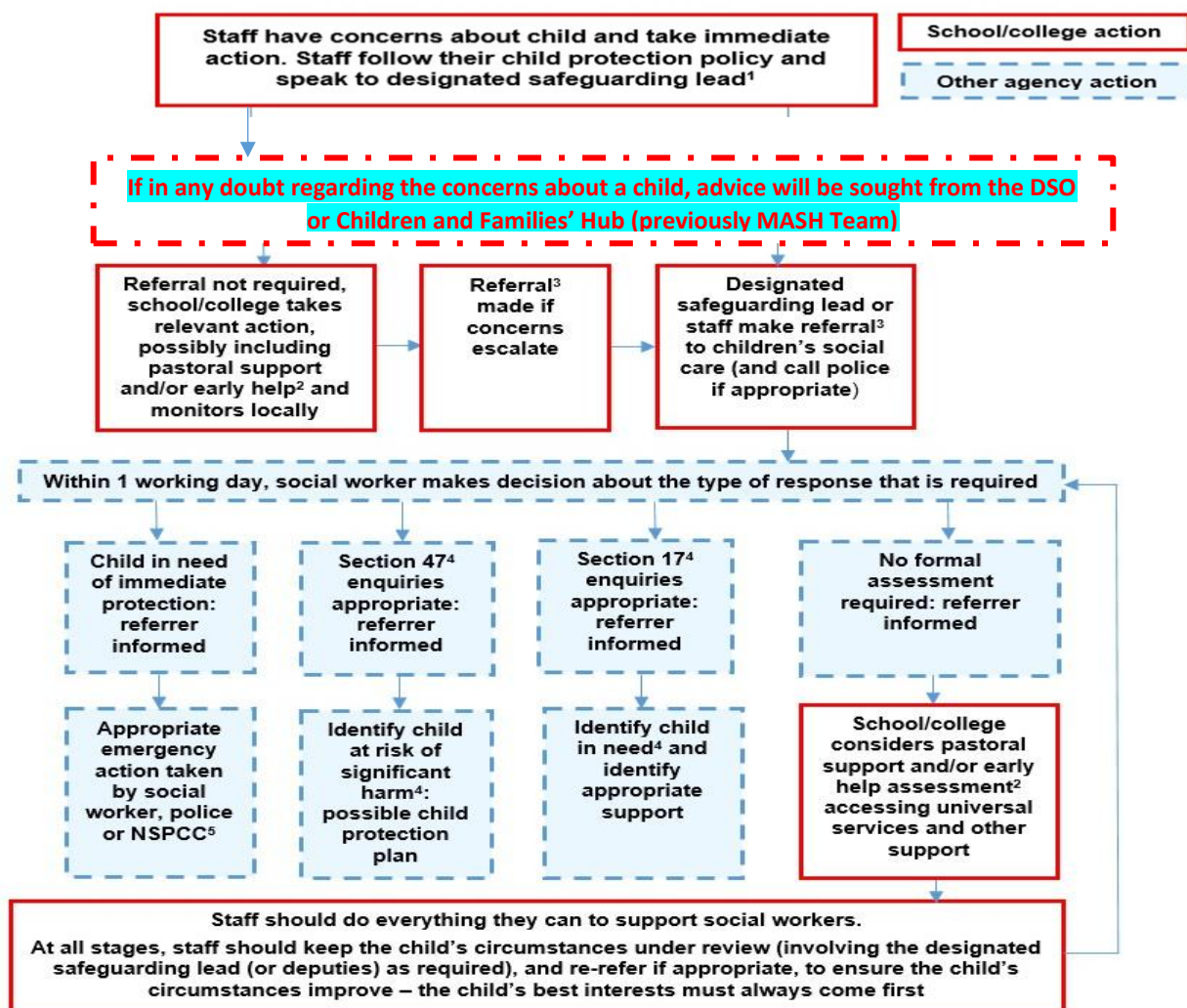


Figure 1 (above and Appendix 8) illustrates the procedure to follow if you have concerns about a child's welfare and the child *is not in immediate danger*.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

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

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

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

13. Community- based Early Help and Targeted Early Help Level of Family Help

Community-based Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If targeted early help level of Family Help is appropriate, the DSL/DDSL will support in liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL/DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a targeted early help level of Family Help assessment, in most cases a member of the schools' Senior Strategic Safeguarding Leadership Team will act as the lead practitioner.

The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements. A referral for targeted early help level of Family Help is made via the safeguarding portals and usually triaged by a social worker.

The schools' Senior Strategic Safeguarding Leadership Team will liaise with the relevant DDSL Phase Leader and, keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed and reported to the Bromley/Kent Local Authority Team.

14. Referral

If it is appropriate to refer the case to Local Authority Children's Social Care or the police, the DSL/DDSL will make the referral or support you to do so.

If a member of staff makes a referral directly, they must tell the DSL/DDSL as soon as possible and record the incident promptly.

The local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the Local Authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

We follow Bromley's/ Croydon's / Kent's protocol's on referring a child for a safeguarding matter. Please visit [Bromley LSCB - Home](#) / [Kent Children's Portal](#) / [Home | Croydon Safeguarding Children Partnership](#) for information on this procedure.

15. If you have concerns about Extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to Local Authority Children's Social Care directly if appropriate (see 'Referral' above).

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

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

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

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

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

Staff have yearly Prevent Training

16. If you have a Mental Health or Wellbeing concern

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

All staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action by contacting the DSL or Senior Mental health Lead, (Mrs Mead DHT.)

17. Promoting the Wellbeing of children and young people

The school will teach children about safeguarding in order that they can recognise when they are at risk and how to get help when they need it. At MSLT schools, through various teaching and learning opportunities (including PSHE sessions) as part of providing a broad and balanced curriculum, the children will be taught about various aspects of safeguarding including on line safety and strategies to support their personal wellbeing.

If you have a Mental Health or Wellbeing concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Examples of mental health problems that may develop into safeguarding concerns include:

- Self-harm
- Suicidal ideation (thoughts about suicide)
- Risk of suicide
- Eating disorders
- Depression and anxiety
- Post-traumatic stress disorder (PTSD)

Warning signs that staff should recognise

Staff are well placed to recognise potential warning signs that a child may be experiencing mental health difficulties, including:

- **Significant changes in behaviour** – becoming withdrawn, aggressive, or displaying unusual behaviour
- **Difficulty sleeping** – tiredness, difficulty concentrating, reports of nightmares
- **Physical signs of self-harm** – unexplained cuts, bruises, or burns, particularly on wrists, arms, thighs, or chest; wearing long sleeves in warm weather
- **Changes in eating patterns** – significant weight loss or gain, skipping meals, obsessive behaviour around food
- **Difficulty concentrating** – not doing as well at school, struggling to focus
- **Mood changes** – becoming more irritable, angry, tearful, or displaying extreme mood swings
- **Social withdrawal** – isolating themselves from friends and family, not wanting to participate in activities they previously enjoyed

- **Expressing feelings of worthlessness or hopelessness** – negative self-talk, expressing that they don't want to be alive
- **Risk-taking behaviour** – such as substance misuse, running away, or engaging in dangerous activities
- **Talking about death or suicide** – either directly or indirectly (e.g., "I wish I wasn't here," "Everyone would be better off without me")

If a child is in immediate danger

If staff believe that a child is in immediate danger due to mental health concerns (for example, if a child is expressing suicidal thoughts or has seriously self-harmed), they must:

1. **Stay with the child** and ensure they are safe
2. **Call 999 immediately** if the child is in immediate physical danger
3. **Take the child to A&E** if they have seriously self-harmed or are at immediate risk
4. **Contact the DSL immediately** (or a member of the Safeguarding Team if the DSL is unavailable)
5. **Contact the child's parents/carers** (unless doing so would place the child at greater risk)

Do not leave a child alone if you believe they are at immediate risk of harm.

If staff have a mental health concern that is also a safeguarding concern

If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action by:

- **Contacting the DSL or a member of the Safeguarding Team immediately**
- **Recording their concerns** on Safeguard/CPOMS (or using the form in Appendix 8 for support staff)
- **Following the procedures set out in Section 7 of this policy**

Support available

Where appropriate, the school will:

- Work with the child and their family to access support from mental health services
- Make referrals to the school's Mental Health Support Team (MHST) if we have access to one
- Provide pastoral support through our Learning Mentors, Emotional Literacy Support Assistants, and Nurture Groups
- Work with external agencies such as CAMHS (Child and Adolescent Mental Health Services)
- In Bromley, the first contact for CAMHS referrals is the iSPA at Bromley Y

Ensuring mental health interventions are safe

The school will make sure that any mental health interventions we offer are:

- Safe and appropriate for the child's needs
- Delivered by appropriately trained staff
- Monitored and reviewed regularly
- Part of a coordinated approach with other agencies where appropriate

All staff should remember that mental health concerns can be indicators of abuse, neglect or exploitation, and should always be taken seriously.

18. Pupils with SEND disabilities or Health issues or are Young Carers

We recognise that pupils with special educational needs or disabilities (SEND) or certain health conditions or those that are Young Carers are not individually an indicator of greater safeguarding risks, but that these pupils can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEND or certain health conditions or are Young Carers being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer pastoral support for these pupils. This may include:

- Learning Mentor and Restorative Justice support
- Emotional Literacy Support Assistant
- Nurture Groups
- Lunch Time Well-Being Groups
- Outside agency therapeutic support
- Consistent behaviour plans and support plans

Any abuse involving pupils with SEND will require close liaison with the DSL (or DDSL) and the Inclusion Lead.

19. Pupils with a Social Worker

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

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

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

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

20. Looked After and Previously Looked-After children

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

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

We have appointed a designated teacher, the Head Teacher and the Inclusion Leader acts as deputy for this group of children, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The DT (Designated Teacher) is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher (DT) will:

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

21. Concerns Around Adults in School (about a staff member or volunteer, contractor or supply or trainee teacher)

If you have concerns about a member of staff (including a contractor, trainee teacher, supply teacher volunteer), or an allegation is made about a member of staff (including a contractor, supply teacher volunteer) posing a risk of harm towards a child/children, speak to the Head Teacher as soon as possible. Concerns which are shared about trainee teachers, supply staff and contractors should be notified to their employers.

Concerns about the DSL should be brought to the attention of the Head Teacher. If you have concerns about the Head Teacher, speak to the Chair of Governors who will follow the procedures set out in Appendix 3, in line with Trust procedures, if appropriate.

Following [Bromley LSCB - Home](#) / [Kent Children's Portal](#) / [Home | Croydon Safeguarding Children Partnership](#) Safeguarding Procedures, the school will inform the LADO / Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

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

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

22. Allegations of abuse made against other pupils (Child-on-Child Abuse)

We recognise that children are capable of abusing other children, and that children with SEND are 3 times more likely to be abused than their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. Any abuse involving pupils with SEND will require close liaison with the DSL (or DDSL) and the Inclusion Lead.

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

Most cases of pupils hurting other pupils will be dealt with under our school’s Behaviour Policy, but this Child Protection and Safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves non-consensual sexual activity, including but not limited to: sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually

inappropriate pictures or videos (including making and sharing of nudes and semi-nudes)

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

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- A TOR for investigation will be created with a Lead Investigator to oversee the investigation and reporting procedures (see also p29 Initial Review Meeting)
- The DSL will put a *Support Plan* into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged instigator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate (in Bromley the iSPA at Bromley Y is the first contact for this referral)

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

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

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

To achieve this, we will:

- › Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- › Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in [section 26](#) below)
- › Ensure staff reassure victims that they are being taken seriously
- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the

curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- › Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

25. Making or Sharing of Nudes and Semi-Nudes

If staff are made aware of an incident involving the consensual or non-consensual **making or sharing of nude or semi-nude images/videos**, they must report it to the Safeguarding Team *immediately*. This includes images or videos that are:

- **Digitally altered** using technology (e.g., a child's face superimposed onto someone else's body)
- **Wholly generated by artificial intelligence (AI)**, such as 'deepfakes'
- Taken, created, or shared without consent
- Shared consensually but later shared more widely without consent

All incidents of making or sharing of nudes or semi-nudes mandate a safeguarding response, regardless of whether the images were created or shared consensually.

Staff must not:

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

Staff must report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary, the incident may be referred to the police by dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded promptly.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

26. Reporting systems for our pupils

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

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

To achieve this, we will:

- › Put systems in place for pupils to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- › Children can share information via worry monsters/ bubble boxes, speaking to a member of the safeguarding team (posters are around the school) or a member of the school staff
- › Children are made aware of these procedures in class, year group and school assemblies and via the PHSE curriculum in line with revised guidance
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>)
- › Pupils will be asked if they are comfortable speaking with the member of staff, their reporting will be checked and they will be assured they have been listened to and the next steps

27. Online Abuse and Cybercrime: Mobile technology

We recognise the importance of safeguarding children and staff from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- › The effectiveness of filtering and monitoring systems will be reviewed at least once every academic year by the headteacher, supported by the DSL and IT support (EDUTHING and SENSO.)
- › Records of these reviews will be kept and will include any actions taken
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual 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 we feel our pupils, or staff are at risk, we will report to the Anti-Phishing Working Group (<https://apwg.org/>).**

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private

- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year. All staff will also receive cyber safety training annually.

Educate parents/carers about online safety via our website, weekly communications sent directly to them and promoting E-Safety at parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school (AUP), use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones, including towards staff

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's [guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Asses ourselves against the filtering and monitoring standards using the Government guidance <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the Child Protection and Safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy. The Head Teacher is responsible for overseeing the safe use of mobile phones and technology across the school, including Early Years.

Mobile Phones

We recognise that mobile phones are now widespread among children and that they can present both opportunities and risks to children's safety and wellbeing.

Our approach

Raglan Primary School operates as a **mobile phone-free environment** during the school day. This means that pupils do not have access to their mobile phones during lessons, breaktimes, and lunchtimes.

Our mobile phone procedure:

- Y5 and Y6 pupils may bring mobile phones to school if they are travelling to and from school alone
- Mobile phones are stored in the child's classroom in a secure container by the class teacher and are inaccessible during the school day
- Children must turn off phones on entering the school site
- Exceptions for pupils with specific needs (e.g., medical conditions)

Staff responsibilities

All staff are responsible for:

- Enforcing the mobile phone procedure consistently
- Challenging pupils who are seen using mobile phones during the school day
- Reporting any concerns about mobile phone use to the DSL, particularly where there are safeguarding concerns
- Modelling appropriate mobile phone use

Searching and confiscation

The DSL or DDSL has the power to search pupils' phones where there is reasonable suspicion that the phone contains evidence of harmful or inappropriate content, or where a pupil has breached the mobile phone procedure. This will be done in line with DfE guidance on searching, screening and confiscation, and our school's behaviour policy.

Any searches will:

- Be conducted by a member of staff authorised by the Head Teacher
- Have a second member of staff present as a witness
- Be recorded and parents/carers informed
-

Safeguarding concerns

Where mobile phone use gives rise to safeguarding concerns (for example, concerns about making and/or sharing of nudes or semi-nudes, online bullying, or inappropriate contact), staff will follow the procedures set out in this Child Protection and Safeguarding Policy and report concerns to the DSL immediately.

28. Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Raglan Primary School recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Raglan Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-bullying and Behaviour policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Raglan Primary School work with LGfL and IT Managed Service Provider to meet the expectations outlined in the Government guidance on generative artificial intelligence (AI) products and systems and how they should meet to be considered safe for users in educational settings.

<https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>

29. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL/ DDSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the Safeguarding Team.

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

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- › Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- › Meet with the alleged instigator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

30. Complaints and concerns about school safeguarding practices

Complaints against staff

Complaints against staff (including temporary, trainee, supply, coaches or peripatetic teachers) that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

Whistle-blowing

The Trust has a Whistle Blowing Policy which staff should refer to should they feel that our Safeguarding Policy is unsafe or failing pupils. [\(Trust Whistleblowing Policy\)](#)

31. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded, either in writing, or on the Safeguard software. If you are in any doubt about whether to record something, discuss it with the DSL. Paper records will be securely stored and digital records via a secure online platform (CPOMS).

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school and in accordance with the Trust's Data Retention Policy. Information will be sent securely to schools on transition which will have been checked by two adults prior to sending and a receipt will be obtained via a secure online portal (for example egress/Safeguard). If a child/children leave the borough or country and there are no details of a receiving school, Bromley/Kent /Croydon Admissions Team and the designated EWO will be informed. Bromley- a home visit will be request prior to ITOR.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

The files will include:

- › A summary of current safeguarding concerns via CPOMS chronology
- › Relevant context via the CPOMS categories
- › Ongoing support needs, as designated by safeguarding partners
- › Clear distinction between current and historic information via the CPOMS chronology

If the concerns are *significant or complex, and/or social services are involved*, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

32. Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

All staff will undertake Prevent Awareness training and FGM Training throughout the year.

Staff will also receive safeguarding and child protection updates through termly e-mail updates and staff meetings as required.

Volunteers and work experience student will receive appropriate training, if applicable.

The DSLs, Deputies and Designated Teachers

The DSLs, Deputies and Designated Teachers will undertake relevant child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Governors

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge and understand their responsibilities.

33. Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

For agency and third-party supply staff and trainee teachers written confirmation to show the dated relevant checks and appropriate certificated have be secured by the agency and the enhanced DBS has been provided in respect to the member of staff.

34. Monitoring arrangements

This policy will be reviewed **annually** by the Head Teacher. At every review, it will be approved by the full governing board.

35. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Complaints
- Health and Safety
- Attendance
- Online Safety
- Children with Medical Needs
- Curriculum Policies including Sex and relationship and health education (PHSE/RSE)
- Educational Visits
- Volunteers
- Late Collection
- MOSAIC Staff Code of Conduct
- MOSAIC Whistle-Blowing
- MOSAIC Recruitment and Selection Policy and Procedures

- MOSAIC The Equal Opportunities Policy
- MOSAIC Disciplinary and Grievance Procedures
- MOSAIC Data Protection Policy
- MOSAIC Trust Critical Incident Management Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (2026)

They are not however exhaustive, and staff should make themselves aware of the information contained on the Bromley/Kent Safeguarding Children Board website which is regularly updated and links to other very useful safeguarding sites.

Bromley LSCB - Home
Kent Children's Portal
Home | Croydon Safeguarding Children Partnership

Appendix 1: Types of Abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. We recognise that parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding recognises that young people are vulnerable to abuse in a range of social contexts.

If there are any concerns staff and parents should share with the DSL immediately.

Appendix 2: Safer Recruitment and DBS checks – policy and procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children
- › That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- › Consider any inconsistencies and look for gaps in employment and reasons given for them
- › Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- › Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- › Not accept open references
- › Liaise directly with referees and verify any information contained within references with the referees
- › Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- › Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- › Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- › Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- › Explore any potential areas of concern to determine the candidate's suitability to work with children
- › Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

We will record all information on the checks carried out in the school's single central record (SCR). We follow requirements and best practice in obtaining these checks, as set out below.

Appointing new staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity

- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available, including using the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks, where appropriate.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher and will undertake a prohibition check for all staff,
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.

These could include, where available:

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

In addition, as part of the shortlisting process, we will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will advise shortlisted candidates that online searches may be done as part of our due diligence checks.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a **regular** basis (once a week or more often, or on more than 3 days in a 30 day period) in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work **regularly** in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- › There are concerns about an existing member of staff's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- › We believe the individual has engaged in relevant conduct; or
- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

• We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Confirmation from the agency that the supply/agency staff, coaches or peripatetic teachers will have completed Safeguarding training from their agencies will be obtained. The staff must read and sign to say they understand KCSIE 2024 Parts 1 & 5 and Annex A & C, the school's Child Protection and Safeguarding Policy, Behaviour Policy and the Staff Code of Conduct) p.166 KCSIE 2022

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. Where the contractor does not have opportunity for regular contact with children, Raglan Primary School will decide on whether a basic DBS check would be appropriate. Raglan Primary School will either obtain the DBS check directly or request to see their DBS certificate to ensure the check is at the level required.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work **unsupervised** or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:

- *Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity*
- *Any volunteer who teaches, trains, instructs or supervises children frequently or more than 3 days in a 30-day period is classed as in regulated activity and requires an enhanced DBS check with barred list information*
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors and Members

All trustees, local governors and Members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

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

All trustees and local governors and Members will have the following checks:

- Identity
- Right to work in the UK
- Other checks if, in the last 5 years they have lived, travelled or worked abroad for more than three months
- A section 128 check

Staff working in alternative provision settings

Where a pupil is placed in an alternative provision (AP) provider, Raglan Primary School continue to be responsible for the safeguarding of that pupil, and will carry out Safeguarding checks to be fully satisfied that the placement meets the pupil's needs. Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. Frequent reviews of safeguarding will be made. Communication between Raglan Primary School and the AP will take place at least weekly.

Adults who supervise pupils on work experience

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

DBS Checking

*Where students **over the age of 16** undertake work experience in school, they will be subject to either a DBS check as a volunteer at the school or a letter of assurance from the work experience candidate's education setting and a risk assessment. **They cannot undertake work experience without this.***

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Record Keeping

Raglan Primary School will apply The Information Commissioner Employment Practices Code published guidance on employment records and record retention.

Appendix 3: Allegations of Abuse Made Against Staff including low-level concerns

Allegations that may meet the harm threshold

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

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

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

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

Suspension of the accused until the case is resolved

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an

individual if we have considered all other options available and there is no reasonable alternative.

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. They can also seek advice and support from their Trade Union Representative, or from the counselling services offered to staff through the Health Assured EAP Scheme and Wisdom App.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the National College for Teaching and Leadership.

Where the police are involved, wherever possible the Academy Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for trainee teachers, supply teachers and all contracted staff

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

- › We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- › The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- › We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- › We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and HR Manager will discuss with the designated officer whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and Information-sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

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

A declaration on whether the information will be referred to in any future reference

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

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

Sharing low-level concerns

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

We will create this culture by:

- › Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- › Empowering staff to share any low-level concerns
- › Empowering staff to self-refer
- › Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- › Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- › Helping to identify any weakness in the school's safeguarding system
- › Training staff where issues arise
- › Provide scenarios to staff to embed the culture
- › Have posters around the school to share who to speak to

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy/code of conduct]. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

- › All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.
- › School's will follow the LA LADO procedures and report relevant matters via the portal or secure email

All concerns will be investigated and all parties informed of the procedures and findings.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- › Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- › Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- › Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a trainee or supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- › The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- › The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: Specific Safeguarding Issues

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will call the police and all named contacts, and members of staff will search the area around the school.

Children who are absent from education

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

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

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school. Elective home education can mean that some children are not in receipt of suitable education, although many home educated children have a positive learning experience.
- Come from new migrant families

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We

will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Alternative Provision (AP)

Where a pupil is placed in an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil. Attendance and attainment will be checked with the AP.

Non-collection of children

If a child is not collected at the end of the session/day, they will be taken to main reception. We will call around all contacts in the first instance. *If this does not result in the child being collected, we will advise contacts that if the child is not collected within 30 minutes of the end of the school day, then social services will be contacted.*

Child criminal exploitation

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 (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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.

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late

- Regularly missing school or education
- Not taking part in education
- Going missing from school or home and are subsequently found in areas away from their own
- Having been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim

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

Child sexual exploitation

CSE is a form of child sexual abuse. It 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, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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.

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

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

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

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

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing

- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- › Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- › Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- › Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- › Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- › Consensual and non-consensual sharing of nude and semi-nude images and/or videos
- › Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- › Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat

groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

When staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, sections 22 and 23 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Children who witness domestic abuse, either in the family setting or outside the immediate family are also victims as this can have a lasting effect on children. They may see, hear or experience the effects in their own home or in their own intimate relationships (teenage relationship abuse) in which they may be victims or instigators of abuse. This can have a long term impact on the child's health, well-being and development and their ability to learn.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy/deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

Where children are placed on Temporary **Accommodation Notification Duty**, the DSL/DDSL **will contact the** Local Housing Authority to raise concerns at the earliest opportunity, and be

vigilant of additional safeguarding concerns. Raglan Primary School will work with the appropriate agencies and the family to support learning.

So-called “honour-based” abuse including FGM and Forced Marriage

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

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

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

FGM

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

Page 29 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl may be:

- Having difficulty walking, sitting or standing, or looking uncomfortable or finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.

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

, **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. Staff will have an awareness of the DfE guidance <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting> or training from the LA Prevent lead.

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Social Media Platforms possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

Staff should **always** take action if they are worried.

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)
- › Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment 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.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Supporting Children Questioning Their Gender

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk. Children with disabilities are 3 times more likely to be abused than their peers

Staff should be aware of the importance of:

- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

We recognise that some children may go through a period of questioning their gender. For the majority of young children, this will not continue into adulthood. We are committed to supporting all children in our care while maintaining our safeguarding responsibilities to all pupils.

When supporting children who are questioning their gender, we will:

- Take time to understand the thoughts and feelings of the child and be appropriately professionally curious
- Be aware of the potential vulnerabilities of these children, including the possibility of complex mental health and psychosocial needs (for example, relating to relationships with family and peers)
- Take a strong, proactive stand against all forms of bullying, including bullying related to gender identity
- Keep in mind that sometimes young children go through a period of questioning their gender, but for the majority this will not continue into adulthood
- Not allow children into toilets, changing rooms, and boarding/residential accommodation designated for the opposite biological sex. No exceptions are permitted, even when supporting a child's social transition.
- We recognise we are able to separate children according to their biological sex when playing certain competitive sports without discriminating unlawfully. Some sports may need to be played in single-sex groups to ensure children's safety, and where this is the case, there must be no exceptions.

Parental involvement

We will actively involve parents/care givers where a child who is questioning their gender asks for support, unless there are exceptional circumstances where doing this would constitute a greater risk to harm the child than not involving them. In such rare cases, we will seek advice from children's social care and document our decision-making carefully.

Social transition

We take a very careful approach in relation to accommodating social transition, particularly in our primary school setting.

Staff must not adopt any changes relating to social transition unless a decision has been made by the school and the child's parents/care givers have been involved.

This includes changes to:

- Names and pronouns used
- Uniform or dress code
- Use of facilities (toilets, changing rooms)
- Participation in activities

Where a child or their parent/carer raises a request relating to social transition to which our school is responding, we will:

- Consider whether pupils would be best supported
- Ensure we document our decision-making process and keep detailed records
- Comply with our distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by our evaluation of the welfare and best interests of the child and other children
- Consider whether full social transition is appropriate, bearing in mind that support for full social transition in primary schools should be agreed very rarely
- Regularly review any decisions made, recognising that a child's needs may change over time

Safeguarding considerations

When considering requests for support, we will assess:

- The child's age and developmental stage
- The child's understanding of their request
- Any mental health or wellbeing concerns
- Family circumstances and parental views
- The impact on the child and other children in the school
- Whether there are any safeguarding concerns that need to be addressed

We will seek advice from relevant professionals, which may include educational psychologists, mental health services, and children's social care where appropriate.

Recording information

We must record a child's biological sex accurately wherever it is recorded in school systems and documentation. This is a legal requirement.

If you have a Mental Health or Wellbeing concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Examples of mental health problems that may develop into safeguarding concerns include:

- Self-harm
- Suicidal ideation (thoughts about suicide)
- Risk of suicide
- Eating disorders
- Depression and anxiety
- Post-traumatic stress disorder (PTSD)

Warning signs that staff should recognise

Staff are well placed to recognise potential warning signs that a child may be experiencing mental health difficulties, including:

- **Significant changes in behaviour** – becoming withdrawn, aggressive, or displaying unusual behaviour
- **Difficulty sleeping** – tiredness, difficulty concentrating, reports of nightmares
- **Physical signs of self-harm** – unexplained cuts, bruises, or burns, particularly on wrists, arms, thighs, or chest; wearing long sleeves in warm weather
- **Changes in eating patterns** – significant weight loss or gain, skipping meals, obsessive behaviour around food
- **Difficulty concentrating** – not doing as well at school, struggling to focus
- **Mood changes** – becoming more irritable, angry, tearful, or displaying extreme mood swings
- **Social withdrawal** – isolating themselves from friends and family, not wanting to participate in activities they previously enjoyed
- **Expressing feelings of worthlessness or hopelessness** – negative self-talk, expressing that they don't want to be alive
- **Risk-taking behaviour** – such as substance misuse, running away, or engaging in dangerous activities
- **Talking about death or suicide** – either directly or indirectly (e.g., "I wish I wasn't here," "Everyone would be better off without me")

If a child is in immediate danger

If staff believe that a child is in immediate danger due to mental health concerns (for example, if a child is expressing suicidal thoughts or has seriously self-harmed), they must:

6. **Stay with the child** and ensure they are safe
7. **Call 999 immediately** if the child is in immediate physical danger

8. **Take the child to A&E** if they have seriously self-harmed or are at immediate risk
9. **Contact the DSL immediately** (or a member of the Safeguarding Team if the DSL is unavailable)
10. **Contact the child's parents/carers** (unless doing so would place the child at greater risk)

Do not leave a child alone if you believe they are at immediate risk of harm.

If staff have a mental health concern that is also a safeguarding concern

If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action by:

- **Contacting the DSL or a member of the Safeguarding Team immediately**
- **Recording their concerns** on Safeguard/CPOMS (or using the form in Appendix 8 for support staff)
- **Following the procedures set out in Section 7 of this policy**

Support available

Where appropriate, the school will:

- Work with the child and their family to access support from mental health services
- Make referrals to the school's Mental Health Support Team (MHST) if we have access to one
- Provide pastoral support through our Learning Mentors, Emotional Literacy Support Assistants, and Nurture Groups
- Work with external agencies such as CAMHS (Child and Adolescent Mental Health Services)
- In Bromley, the first contact for CAMHS referrals is the iSPA at Bromley Y

Ensuring mental health interventions are safe

The school will make sure that any mental health interventions we offer are:

- Safe and appropriate for the child's needs
- Delivered by appropriately trained staff
- Monitored and reviewed regularly
- Part of a coordinated approach with other agencies where appropriate

All staff should remember that mental health concerns can be indicators of abuse, neglect or exploitation, and should always be taken seriously.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- › Being male
- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

If you have concerns about Serious Violence

Serious violence is a safeguarding concern. All staff should be aware of the indicators that a child may be at risk from, or involved with, serious violent crime.

What is serious violence?

Serious violence includes:

- Physical assault causing serious harm
- Carrying, threatening with, or using weapons (including knives, firearms, or other offensive weapons)
- Gang-related violence
- Violence linked to county lines and drug dealing

Indicators that a child may be at risk

Indicators which may signal that a child is at risk from, or involved with, serious violent crime include:

- Increased absence from school or disengaged from education
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance or behaviour
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries (particularly defensive injuries)
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs)
- Carrying or talking about weapons

- Expressing intent to harm others or themselves
- Showing signs of trauma or distress

Risk factors

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Having disrupted education (e.g., suspensions, permanent exclusions, or time in alternative provision)
- Having a history of offending

Timing of risk

Staff should stay alert to when children might be at highest risk of serious violence. This includes:

- **Straight after school** – when children are travelling home or gathering in public spaces
- Times of transition
- During periods of exclusion or absence from school

What staff should do

If a child is carrying or using a weapon, or expressing intent to do so, staff must:

1. Report this to the DSL or DDSL immediately
2. **Not put themselves or others at risk:** do not attempt to confiscate a weapon if this would be dangerous
3. Call 999 if there is immediate danger
- 4.

The DSL or DDSL will:

- **Assess the risk** and decide on the appropriate response
- **Contact the police** where appropriate, particularly if there is an immediate risk or a weapon is involved
- **Make a referral to children's social care** if there are safeguarding concerns
- **Work with the child and family** to access support
- **Consider early, evidence-based support** for children at risk, such as:
 - Targeted mentoring programmes
 - Therapeutic support
 - Engagement with youth services
 - Referral to violence reduction programmes

Early intervention

We recognise the importance of early, evidence-based support for children considered at risk of serious violence. The DSL will work with relevant agencies to ensure children receive appropriate support as early as possible.

Information sharing

Where there are concerns about a child carrying or using a weapon (or expressing intent to do so), the DSL will share this information with relevant agencies and with any new school if the child transfers. This is to ensure that appropriate risk assessments and support plans are in place.

Prohibited Items

The school complies with the DfE Searching, screening and confiscation Guidance 2022: The Head Teacher or staff authorised by them can make the decision to search pupils or their possessions, without consent, if they have reasonable grounds for suspecting prohibited items, such as:

- Knives or weapons
- Alcohol
- Illegal or controlled drugs
- Stolen items
- Tobacco and cigarette papers or vape items
- Fireworks
- Pornographic materials
- Any article that staff reasonably suspect has been, or is likely to:
 - Cause personal injury
 - Damage to property or persons
 - Any items banned by the school and identified in the school rules

No member of staff will carry out any search without a member of the Safeguarding Team present. Parents and carers will be informed of any search.

New Migrant Families

Additional processes have been put in place by the local authority to smooth the transition into school of children from migrant families entering the UK in the light of the Ukrainian crisis. The DSL will work with the local authority when the children start school and will work with the parents and an interpreter to obtain background information.

We will be aware that the child may have witnessed traumatic events, and may be separated from members of the family who remain in the Ukraine.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in and wear a visitor's badge. Staff are expected to challenge anyone they see on site without a visitor badge visible.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate, eg social workers)

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

Appendix 5: Safeguarding Considerations for Remote Education

On-line safety

All schools are now using more online resources, and the resources used must all comply with the Trust GDPR requirements. As part of the online planning process we must ensure children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. Staff must be aware that some children are more at risk of harm, and that this applies also to online harm. As well as reporting routes back to the school this should also signpost children to age-appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content □
- [CEOP](#) - for advice on making a report about online abuse

Online-safety is regularly referenced in whole school assemblies and throughout the curriculum.

We are in regular contact with parents and carers, for example through weekly newsletters and also through the home learning being set each week. We should use our lines of communication to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school their child is going to be interacting with online.

Parents and carers may well be looking for other support from the many companies offering tuition. Schools must advise parents of the need to use reputable providers who can evidence their online safety and credentials for having access to children. Schools should signpost parents and carers to the following support:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and carers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

Updates for keeping safe online are published on the school website for parent access with details for reporting online abuse.

Appendix 6: Children Adopted from Care

Adoption is a very sensitive issue and Raglan Primary School have a process to ensure that the child's move, either into or away from Raglan, is dealt with carefully and with a view to ensure that we do not jeopardise the child or the adoption placement. That a child is in care or adopted should be on a need-to-know basis. The member of staff with responsibility for looked after children is Mr M De Freitas Headteacher.

The Adoption Process

A child may arrive at school living with their pre-adoptive parents. At this stage, they are still a Child Looked After with parental responsibility shared between the LA and the pre-adoptive parents. The adoption will usually take place some months later at which point the parental responsibility moves to the adoptive parents.

When the child joins the school, the pre-adoptive parents may wish the child to be known by their surname, as it will change to this after the adoption. At this stage, the child must be registered with the legal surname and the pre-adoptive family surname as preferred.

Creating an MIS Record

Although it is likely that a CTF will be available from the previous school, there will be situations in which this is not the case to ensure that the child cannot be traced. If Raglan Primary is the "previous" school, then the designated teacher should liaise with the social worker to determine whether a CTF can be generated with the new school as the destination. If not, the CTF can be generated with LLLL coding and the new school can collect from S2S.

If Raglan Primary is the receiving school, the previous school **SHOULD NOT** be contacted until the Designated Teacher has spoken to the social worker.

The paper file should move to the new school via the social worker and the Virtual School who will go through the file to remove any information around the child's previous identity or which might be detrimental to the placement with the adoptive parents. This should also happen if a child is remaining at the same school.

UPN

The DfE guidance <https://www.gov.uk/government/publications/unique-pupil-numbers> clearly states the need for a new UPN to be issued. The previous UPN should be deleted, and NOT recorded under previous UPN. (There are some very limited situations in which the previous UPN information may be retained, but this is only with the permission of the adoptive parents and the LA adoption service, and a new UPN will still have to be generated).

The issue of a new UPN will mean that historic assessment and other educational data will be lost and have to be re-entered to the MIS against the new identity. As a minimum, this should be end of Key Stage results and summary attendance data for at least an academic year.

In the case of a child in school being adopted and staying at Raglan Primary School, the following is a step-by-step guide to dealing with the situation, which will involve creating a brand-new student, making the existing student a Leaver and erasing any links between these two students.

Creating a new student

- Create a new student on the system in the child's new identity
- Enter the relevant class and use the date of adoption as the admission date
- Issue the student with a new UPN
- Ensure that the child's record shows the new address
- Check that the adoptive parents' details are copied onto the new record, then break the link with the existing student
- Enter all relevant data relating to dietary, medical, ethnic/cultural and first language (provided by adoptive parents)
- There should be no previous school history or attendance history prior to the adoptive date – student must be treated as a completely new child.
- Enter assessment data as applicable or download from Key to Success

Amending the original student

- Search for the original existing Student and open their record
- The Legal & Preferred Surname and Forename must both read the pre-adopted legal names
- Delete the Student's Photograph
- All Registration details stay with the student's record (including UPN)
- Delete the current Home Address
- Enter the School address as the Student's Current Address and set the Address Type as Home – This is to ensure that this record will not fail when you submit the next Census Return
- Highlight and Delete all Telephone Numbers and Email Addresses
- Highlight and Delete the Adoptive Parents in Contacts
- Enter the Date of Leaving and the Reason for Leaving as Unknown. In most circumstances the date of leaving will be before the date of adoption.
- Destination After Leaving field to be left blank
- It is important you check if there are any Linked Documents containing any reference to the new Student or his/her new adopted Parents. If so, they will need to be deleted

Pupil Premium

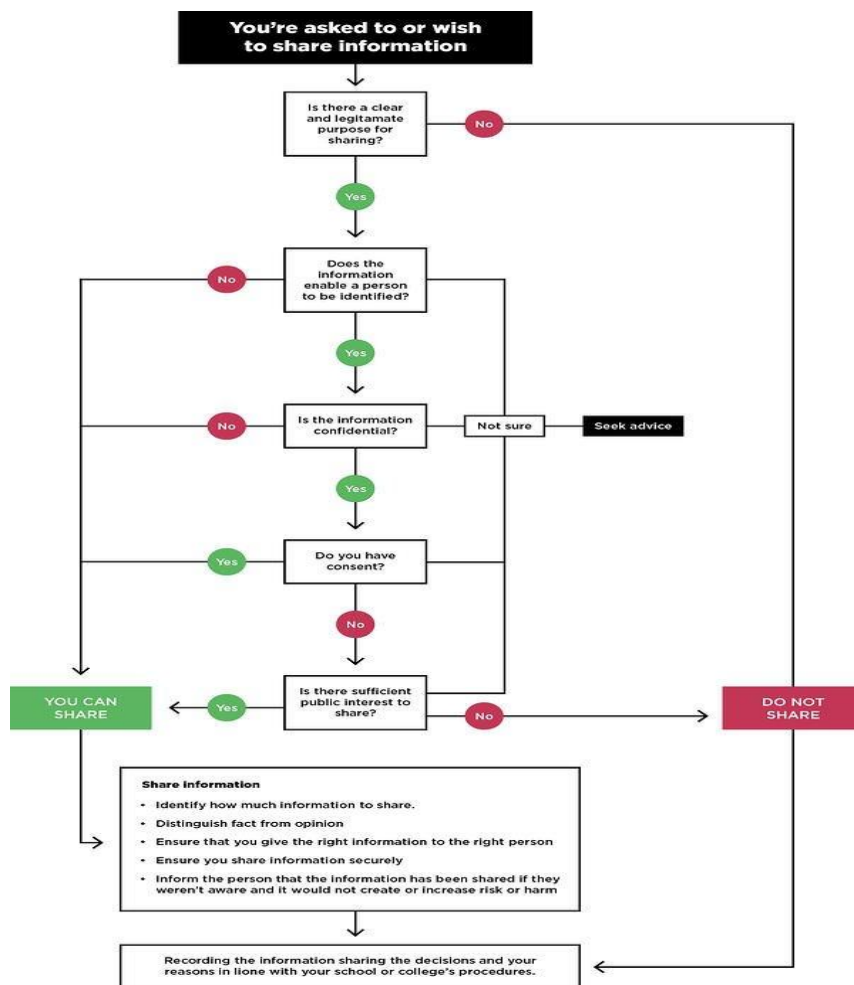
Whilst the child is in care, the school will receive Pupil Premium CLA, but once adopted the child will no longer be in the care of the LA. The child can be entitled to receive Pupil Premium (PP+) as a child who has been adopted from care, but the school will need the express permission of the adoptive parents in order to be able to claim this.

Appendix 7: Information Sharing in Schools: The Seven Golden Rules to Follow

To keep children and young people safe in schools and colleges, you need to share information appropriately so the correct decisions can be made to protect them. This is why the government has outlined the seven golden rules for information sharing as safeguarding involves sensitive information which directly affects the welfare of children and young people.

However, clear boundaries around information sharing or disclosures are important to maintain confidentiality where appropriate. Underneath the seven golden rules for information sharing below, you'll also find a useful flowchart of key questions.

1. GDPR Isn't a Barrier to Sharing Information
2. Be Open and Honest
3. Seek Advice
4. Share With Consent Where Appropriate
5. Consider Safety and Wellbeing
6. Necessary, Proportionate, Relevant, Accurate, Timely and Secure
7. Keep a Record



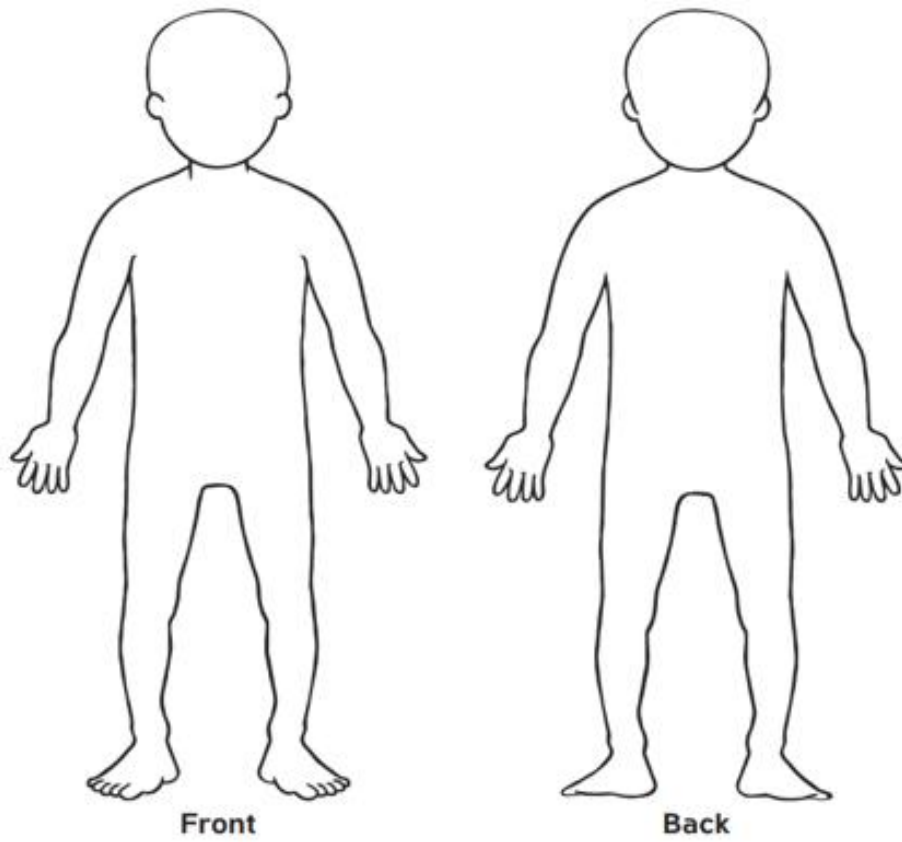
<https://blog.insidegovernment.co.uk/schools/information-sharing-the-seven-golden-rules-to-follow>

Appendix 8: Disclosure and Concerns Reporting Form & Body Map

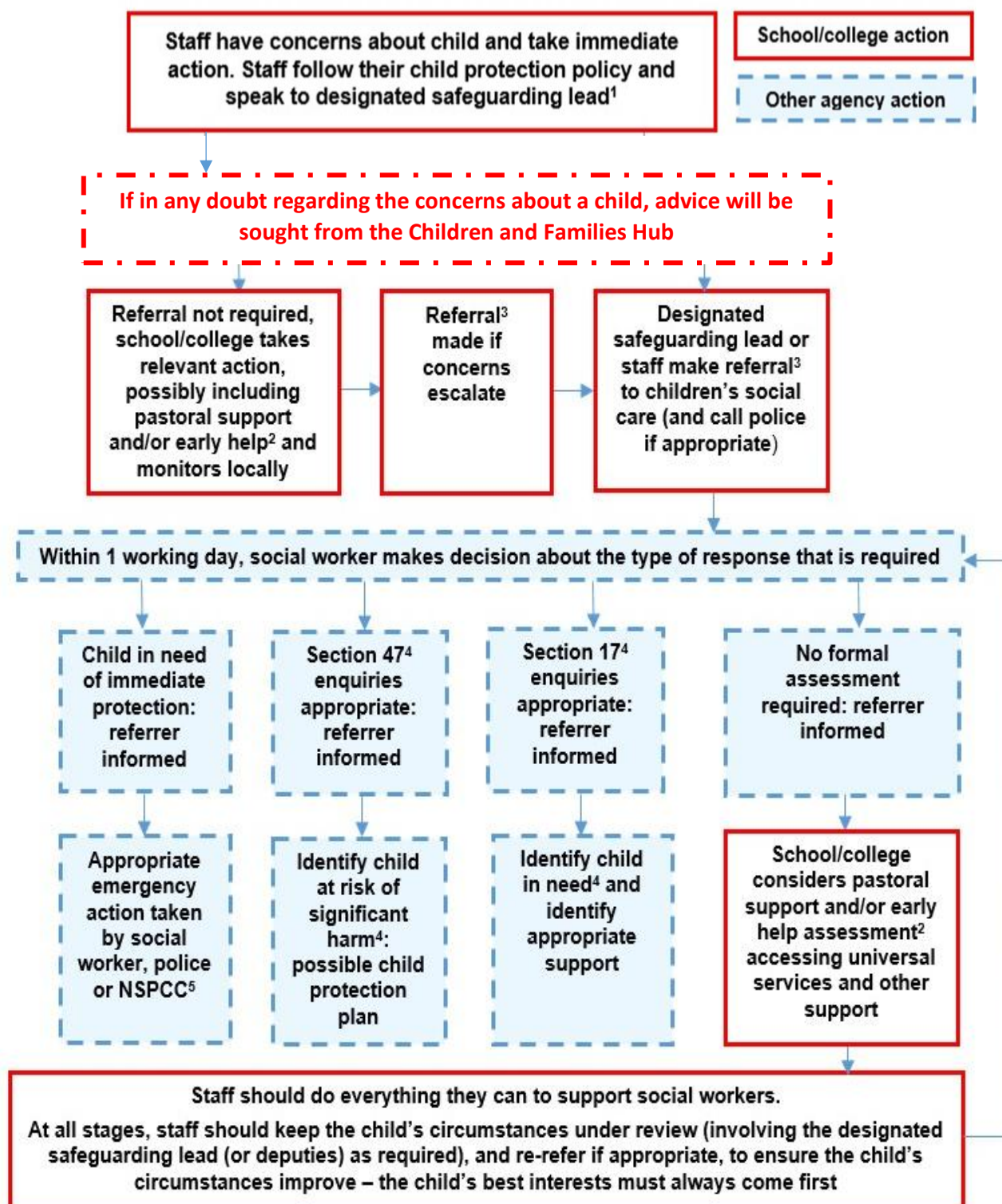
Incident or Disclosure Reporting Form

Name of child and class	
<p>Nature of concern</p> <p>What was said</p> <p>What did you say</p> <p>What you saw</p> <p>Place of incident or disclosure</p> <p>Witnesses</p> <p>If there is an injury, mark on the body map</p>	
Time	
Date	
Your name	

Body Map



Appendix 9: Flowchart of Actions where there are Concerns about a Child
(quick reference – adapted from the KCSIE 2026 guidance)



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. See [Working Together to Safeguard Children](#) for further guidance.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Appendix 10: Filtering Standard for MOSAIC

Schools within MOSAIC have a managed broadband service with one of two providers.

- LGfL provide a filtering system called Senso
- EIS provide a filtering system called Smoothwall.

For both systems TIO IT Consultants have access for the purposes of configuring settings, monitoring for issues, tweaking the filtering, and contacting providers for any support required.

How Filtering Systems Work

Filtering systems have categories that are either allowed or blocked for groups of users. In addition to this, each school has its own list of exceptions of websites that are allowed or denied.

Guest Wi-Fi networks intentionally deny users access to the school network but still provide a filtered connection to the Internet via a specific policy.

Monitoring of Systems

EDUTHING and SENSO access the filtering systems to check filtering policies and ensure that:

- They are applying to the correct users and devices on the school network.
- The correct categories are allowed or denied.
- The school's custom lists are updated according to need.

Scheduled reports can be run that will send data to relevant staff. SWGfL's testing tool can be run to check that the filtering system is operational.

Both providers have confirmed that

- They are members of the Internet Watch Foundation
- They implement the CTIRU block list which cannot be bypassed.
- Techniques and technologies to bypass filtering is also blocked.

Desktop monitoring systems can be expensive to purchase and run and they are only supported on Windows computers. Schools should risk assess if they require monitoring software, or if they can adequately monitor devices using staff observation. It should be noted however that monitoring software will run on desktop computers and laptops but not mobile devices such as iPads.

The schools filtering and monitoring provision is reviewed annually by IT Managed Service Provider for Education as part of a suite of Cyber Security checks undertaken to ensure the security in integrity of the school network and to ensure cyber resilience. While EDUTHING and SENSO provide technical support and annual cyber security checks, the school leadership team is responsible for the strategic review of effectiveness.

Reporting Concerns

Staff should notify an IT Managed Service Provider if: unsuitable material has been accessed, if they are teaching topics which could create unusual activity on the filtering logs, there is failure in the software or abuse of the system or if they notice abbreviations or misspellings that allow access to restricted material.

Filtering systems will identify the device name, date, time, and search criteria of an incident.

If a website needs to be blocked or if there are concerns that the filtering system is not operating correctly, staff should immediately log a ticket with the IT consultant who will investigate.

Appendix 11: Key Persons and Contacts for Bromley LA

AGENCY	CP TEAM	ROLE	CONTACT DETAILS
Bromley Children's Safeguarding Partnership	Gemma Taylor	Local Authority Designated Safeguarding Lead (LADO)	020 8461 7669 (via Bromley Safeguarding Children's Board) gemma.taylor@bromley.gov.uk lado2@bromley.gov.uk (general enquiries) lado@bromley.gcsx.gov.uk (secure email)
Bromley Children's Safeguarding Partnership	Libby Kember	Education Safeguarding Officer (ESO)	Tel: 0208 313 4665 Mobile number: 07974 870 800 E: Libby.kember@bromley.gov.uk W: www.bromley.gov.uk
Bromley Safeguarding Nursing Team	Sarah Brooks Leanne	School Nurse Health Advisor (SCPHN)	0300 330 5777 Options 1. 6, 2 E: bromh.bromley0to19@nhs.net bromh.snsafeguarding@nhs.net W: bromley0to19.co.uk
Metropolitan Police	A/PS Joe Godwin	Bromley Schools Team School Sergeant Simon Alexander	T: 0207 230 1212 E: SNMailbox.SchoolsTeamBromley@met.police.uk W: www.met.police.uk
South-East London Integrated Care	Dr Angela Bhan	Managing Director	T: 0208 176 5330 E: angela.bhan@selondonics.nhs.uk W: www.bromleyccg.nhs.uk

Board (ICB)			
Bromley Council (Children's Services)	Richard Baldwin	Director of Children's Services	T: 020 8313 4062 E: richard.baldwin@bromley.gov.uk W: www.bromley.gov.uk
Bromley Local Authority Bromley Council	Jared Nehra	Director of Education	T: 020 8313 4501 E: jared.nehra@bromley.gov.uk W: www.bromley.gov.uk
Multi-Agency Safeguarding Hub (MASH)		Children and Families Hub	T: 020 8461 7373/7379/7026 Out of Hours 030 0303 8671 E: mash@bromley.gov.uk W: www.bromleysafeguarding.org
Bromley Safeguarding Partnership Bromley Council		Early Help https://bromleyparentinghub.info/earlyhelp/earlyhelpstrategy	T: 020 8461 7373/7379/7026 Out of Hours 030 0303 8671 E: mash@bromley.gov.uk W: www.bromleysafeguarding.org
Post Adoption Team Education & Social Care Bromley Council	Mary Fernandes	Duty Social worker - Bromley Adoption	T: Bromley Adoption Duty 020 8313 4193 Out of Hours: 0300 303 8671 E: adoption@bromley.gov.uk W: www.bromley.gov.uk
Bromley Virtual School	Sally Kelly	Head of the Virtual School	T: 020 8461 7986 E: sally.kelly@bromley.gov.uk virtual.school@bromley.gov.uk W: www.bromley.gov.uk

Anti-Radicalisation PREVENT Team	Robert Vale	Head of Safer Communities Public Protection Division	T: 0208 313 4785 020 7340 7264 E: Counter.terrorism@education.gsi.gov.uk Prevent.London@service.education.gov.uk
Channel helpline		020 7340 7264	Channel helpline
Raglan Primary School Safeguarding Team		Safeguarding Governor Dr J Reed DSL Mr M De Freitas DDSLs Mrs S Collins Mrs D Mead Miss R Ezinwa Mrs E Ingrey Mr L Farmer BSC Mrs C Carberry ASC Mrs E Prescott	

Appendix 12: Additional Advice and support including National Agencies

Abuse or safeguarding Issue (A-Z)	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2	DfE Advice
	Domestic Abuse: Various Information/Guidance https://www.gov.uk/guidance/domestic-abuse-how-to-get-help	Home Office
	Faith Based Abuse: National Action Plan https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE Advice
	Relationship Abuse: disrespect nobody https://www.gov.uk/government/collections/disrespect-nobody-campaign	Home Office Website
	OE Teachers' National helpline https://www.operationencompass.org/teachers-helpline 0204 5513 9990	DfE Advice
	Disrespect NoBody campaign https://www.gov.uk/government/collections/disrespect-nobody-campaign	Gov UK
Bullying	Preventing bullying including cyberbullying Preventing bullying - GOV.UK	DfE Advice
Children and the courts	Advice for 5 – 11 year old witnesses in criminal courts https://www.gov.uk/government/publications/youngwitnessbooklet-for-5-to-11-year-olds https://insidehmcts.blog.gov.uk/2023/04/27/improving-support-for-children-going-to-court-as-witnesses/ https://www.cafcass.gov.uk/	MoJ Advice
Children missing from education, home or care	Children missing education Children missing education - GOV.UK	DfE Statutory Guidance
	Children missing from home or care https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care	DfE Statutory Guidance
	Children and adults missing strategy https://www.gov.uk/government/publications/missing-children-and-adults-strategy	Home Office Strategy

Children with Family Members in Prison	National Information Centre on Children of Offenders https://www.nicco.org.uk/ https://safeguarding.network/content/safeguarding-resources/parental-issues/children-with-family-members-in-prison Prisoners' Families Helpline	Barnardo's in partnership with Her Majesty's Prison and Probation Service advice
Children with Family members in the court system	CAFCASS Cafcass, 16th Floor, Southern House, Wellesley Grove, Croydon, CR0 1XG Website: www.cafcass.gov.uk Call Centre: 0300 456 4000	Bromley Safeguarding Partnership
Child Exploitation	County Lines: Criminal exploitation of children and vulnerable adults https://www.childrensociety.org.uk/information/professionals/resources/county-lines-toolkit What is county lines and child criminal exploitation? - Missing People	Home Office Guidance
	Child Sexual Exploitation: guide for practitioners Child Sexual Exploitation The Children's Society	Children's society and Home Office
	Trafficking: Safeguarding Children Safeguarding children who may have been trafficked - GOV.UK	DfE
Drugs	Drugs: Advice for Schools https://www.gov.uk/government/publications/drugs-adviceforschools	DfE and ACPO advice
	Drugs Strategy 2017 https://www.gov.uk/government/publications/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives	Home Office Strategy
	Drug and alcohol education	PSHE Organisation
	https://www.talktofrank.com/	Frank
FGM	https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation	Home Office
	https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack	Gov Guidance
Forced Marriage	Forced marriage - GOV.UK	Gov Guidance

Health and Well-Being	Fabricated or Induced Illness https://www.nhs.uk/mental-health/conditions/fabricated-or-induced-illness/overview/	NHS
	Rise Above: Free PSHE resources on health, well-being and resilience https://pshe-association.org.uk/search?queryTerm=every%20mind%20matters	Public Health England
	Medical Conditions: Supporting children in school https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3	DfE Statutory Guidance
	Mental Health and Behaviour https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities	Ministry of Housing communities
Modern Slavery	Modern Slavery Statutory Guidance https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims	Gov.uk Guidance
Online	<p>Sexting: responding to incidents and safeguarding children https://www.gov.uk/government/groups/uk-council-forchildinternet-safety-ukccis</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS Education for a Connected World .pdf</p> <p>https://www.childnet.com/resources/cyberbullying-guidance-for-schools/</p> <p>https://www.childrenscommissioner.gov.uk/resource/talking-to-your-child-about-online-sexual-harassment-a-guide-for-parents/</p> <p>https://learning.nspcc.org.uk/online-safety/online-safety-for-schools</p>	<p>UK Council for child internet safety</p> <p>Childnet</p> <p>NSPCC</p>
Private Fostering	Private Fostering: Local Authorities https://www.gov.uk/government/publications/children-act-1989-private-fostering	DfE Statutory Guidance
Radicalisation	Prevent duty guidance	HO Guidance

	https://www.gov.uk/government/publications/serious-violence-strategy	
	Prevent duty advice for schools https://www.gov.uk/government/publications/protectingchildrenfrom-radicalisation-the-prevent-duty	DfE advice
	Managing the risk of radicalisation advice for schools https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting	DfE Advice
	Educate against Hate https://www.educateagainsthate.com/	DfE and HO
Special Educational Needs and Disabilities Information	SENDIASS Find your local IASS service (councilfordisabledchildren.org.uk) https://www.kids.org.uk/sendias-home/	Local Authority service
Violence	Gangs and youth violence for schools and colleges https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence	HO Advice
	Violence against women and girls: national statement of expectations for victims https://assets.publishing.service.gov.uk/media/6244459dd3bf7f32a93d3b76/National_Statement_of_Expectations_2022_Final.pdf	HO Guidance
	Sexual Violence and sexual harassment between children in schools and colleges https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges	DfE advice
	Resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/	DfE advice
	Preventing Child Sexual Exploitation – The Children’s Society and Home Office https://www.childrensociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation	DfE advice
	Serious violence strategy https://www.gov.uk/government/publications/seriousviolencestrategy	HO Strategy

