Reach Schools

CHOICE & OPPORTUNITY FOR EVERY CHILD

Reach Schools

Safeguarding and child protection policy and procedures

Document Control Table	
Title	Safeguarding & Child Protection
Category	Students
Owner	Trust Designated Safeguarding Lead
Date approved	1st September 2026
Approved by	Board of Trustees
Date of next review	July 2027
Updates/revisions	July 2026: *The policy has been updated to take account of the 2025 version of Keeping Children Safe in Education (KCSIE), which comes into force on **1 September 2026.** The changes this academic year:* • supporting pupils who are questioning their gender; • mobile phones in school; • serious violence; sexual harassment and violence and

	• a new requirement that all staff must read part 1 of KCSIE in full

Nothing is more important than children's welfare. Children have a right to be cared for and feel safe, protecting them is everyone's responsibility. Here at Reach Schools we have a duty of care to ensure that all users of the school are kept safe from harm.

The Trustees, Governors and staff of Reach Schools are committed to providing a secure and supportive environment in which children can develop and grow into mature and responsible people. Safeguarding children is an essential part of our holistic approach to ensure that children are protected from abuse and neglect and that every child reaches their full potential. We recognise that all staff, including volunteers, have a full and active part to play in protecting our students from harm. In this policy, 'staff' includes regular volunteers.

All Trustees, Governors and staff understand that our school should provide a caring, positive, safe and stimulating environment which promotes the social, physical, emotional and moral development of the individual child.

At Reach Schools, we aim to foster an ethos in which children feel secure, their viewpoints are valued and they are encouraged to talk and are listened to. We are responsible for creating a safe and healthy environment for students.

It is the responsibility of all members of staff to provide a safe environment in which students may develop their self-esteem and respect for one another. It is important that we use the curriculum (both 'overt' and 'hidden') to raise students' awareness of the support networks around them, allowing them to build confidence in accessing a range of contacts and strategies to ensure their own protection, whilst understanding the importance of protecting others, and develop more responsible attitudes to adult life and parenthood. Local Authority Child Protection Guidelines are held in the school for reference.

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Contents

Designated Safeguarding Lead/ Important Contacts **6**
1. Aims **8**
2. Legislation and statutory guidance **8**
3. Definitions **10**
4. Equality statement **12**
5. Roles and responsibilities **13**
5.1 All staff 14
5.2 The Designated Safeguarding Lead 16
5.3 The trustees and local governing bodies 17
5.4 Co-Headteachers 19
5.5 Virtual school heads 20
6. Confidentiality **20**
7. Recognising abuse and taking action **23**
7.1 If a child is suffering or likely to suffer harm, or in immediate danger 24
Deciding whether to refer to social care 24
Tell the DSL (see section 5.2) as soon as possible if you make a referral directly 25
7.2 If a child makes a disclosure to you 25
7.3 If you discover that FGM has taken place or a pupil is at risk of FGM 26
7.4 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) 27
Early Help 28
Referral 28
Escalation Process 29
7.5 Concerns about extremism 29
7.6 Concerns about mental health 30
7.7 Concerns about a staff member, volunteer or contractor 33
7.8 Allegations of abuse made against another pupil 33
Procedures for dealing with allegations of child-on-child abuse 34
Creating a supportive environment in school and minimising the risk of child-on-child abuse 34
7.9 Sharing of nudes and semi-nudes (‘sexting’) 37
Your responsibilities when responding to an incident: 37
Initial review meeting 37
Further review by the DSL 39

Informing parents/carers 39
Referring to the police 39
Recording incidents 39
Curriculum coverage 40
7.10 Reporting systems for our pupils 40
8. Online safety and the use of mobile technology 41
The 4 key categories of risk 42
8.1 Artificial intelligence (AI) 44
9. Notifying parents or carers 45
10. Pupils with special educational needs, disabilities or health issues 45
11. Pupils with medical conditions 46
12. Young Carers 47
13. Pupils with a social worker 47
14. Looked-after and previously looked-after children 47
15. Pupils who are lesbian, gay or bisexual 48
16. Pupils who are questioning their gender 49
16.1 Supporting pupils who are questioning their gender 49
16.2 Involving parents/carers in cases of pupils questioning their gender 49
16.3 Considering requests for support with social transition 49
16.4 Rules on single-sex spaces 50
16.5 Rules on single-sex sports 50
17. Complaints and concerns about school safeguarding policies 51
17.1 Complaints against staff 51
17.2 Other complaints 51
17.3 Whistle-blowing 51
18. Record Keeping 51
19.Training 54
19.1 All staff 54
19.2 The DSL and deputies 54
19.3 Trustees and Governors 55
19.4 Recruitment – interview panels 55
19.5 Staff who have contact with pupils and families 55
20. Monitoring arrangements 56
21. Links with other policies 56
Appendix 1: Types of abuse 59

Appendix 2: Safer recruitment policy **60**
Advertising 61
Application forms **61**
Shortlisting **62**
Seeking references and checking employment history 63
Interview and selection 64
Pre-appointment vetting checks **64**
New staff 64
Online searches 66
Existing staff and volunteers 68
Disclosing previous convictions and Enhanced DBS checks 68
Agency and third-party staff 70
Contractors 70
Trainee/student teachers 71
Volunteers 71
Governors and trustees 72
Staff working in alternative provision settings 72
Adults who supervise pupils on work experience 72
Pupils staying with host families 73
Appendix 3: Allegations against staff (including low-level concerns) **74**
Allegations that may meet the harm threshold 74
Suspension of the accused until the case is resolved 75
Definitions for outcomes of allegation investigations 75
Procedure for dealing with allegations 76
Additional considerations for all contracted staff 78
Timescales 79
Specific actions 79
Confidentiality and information sharing 80
Record-keeping 81
References 81
Learning lessons 82
Non-recent allegations 82
Concerns that do not meet the harm threshold 83
Definition of low-level concerns 83
Sharing low-level concerns 84

Responding to low-level concerns 84
Record keeping 85
References 85
Appendix 4: Specific safeguarding issues 86
Assessing adult-involved nude and semi-nude sharing incidents 86
Sexually motivated incidents 86
Financially motivated incidents 87
Children who are absent from education 88
Private Fostering 89
Child criminal exploitation 90
Child sexual exploitation 91
Child-on-child abuse 92
Domestic abuse 94
Homelessness 95
So-called ‘honour-based’ abuse (including FGM and forced marriage) 95
FGM 95
Forced marriage 97
Preventing radicalisation 98
Sexual violence and sexual harassment between children in schools 101
Serious violence 103
Checking the identity and suitability of visitors 104
Non-collection of children 105
Missing pupils 105

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Designated Safeguarding Lead/ Important Contacts

Role	Name	Contact details
Trust Designated Safeguarding Lead	Georgia Strong	georgia.strong@reachacademy.org.uk 07788252898
Designated safeguarding Lead **Reach Academy Hanworth Park**	Georgia Strong	georgia.strong@reachacademy.org.uk 07788252898
Designated Safeguarding Lead **Reach Academy Feltham**	Elly Grantham	elly.grantham@reachacademy.org.uk
Designated Deputy Safeguarding lead **Reach Academy Feltham**	Lily Bough	lily.bough@reachacademy.org.uk
Co-headteachers **Reach Academy Feltham**	Manjit More & Harpreet Dhillon	manjit.more@reachacademy.org.uk harpreet.dhillon@reachacademy.org.uk
Designated Deputy Safeguarding Lead **Reach Academy Hanworth Park**	Louis Everett	louis.everett@reachacademy.org.uk
Designated Deputy Safeguarding Lead **Reach Academy Hanworth Park**	Jerome Barlow	jerome.barlow@reachacademy.org.uk
Designated Deputy Safeguarding Lead **Reach Academy Hanworth Park**	Juli Ryzop	juli.ryzop@reachacademy.org.uk

Co-headteachers **Reach Academy Hanworth Park**	Louis Everett & Kirsty Simkin	Louis.everett@reachacademy.org.uk kirsty.simkin@reachacademy.org.uk
Nominated trustee for safeguarding, child protection and looked after children	Kimberly Downton	Kimberly.downton@reachacademy.org.uk
Nominated local governor for safeguarding, child protection and looked after children **Reach Academy Feltham LGB**	Fiona Green	fiona.green@reachacademy.org.uk
Nominated local governor for safeguarding, child protection and looked after children **Reach Academy Hanworth Park LGB**	Phil Bell	phil.bell@reachacademy.org.uk
Chair of Trustees	Judith Tacon	judith.tacon@reachacademy.org.uk
Chair of Local Governing Body - **Reach Academy Feltham**	Juliette Cammaerts	Juliette.cammaerts@reachacademy.org.uk
Chair of Local Governing Body - **Reach Academy Hanworth Park**	Jason Manketo	jason.manketo@reachacademy.org.uk
Local Authority designated Officer (LADO)	Sarah Paltenghi and Grace Murphy	sarah.paltenghi@hounslow.gov.uk grace.murphy@hounslow.gov.uk
Clare Mckinlay	Safeguarding advisor to Hounslow LA	Clare.McKinlay@hounslow.gov.uk
Prevent - Hounslow	Joan Conlon Najeeb Ahmed	07976 757856 07890 540433

For further information on related policies, please visit our website:

https://reachacademyhanworthpark.com/

https://www.reachacademyfeltham.com/

https://reachschools.uk/

1. Aims

Our school aims 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;
- To support the child's development in ways that will foster security, confidence and independence;
- To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse;
- To provide a systematic means of monitoring children known or thought to be at risk of harm;
- To emphasise the need for good levels of communication between all members of staff. To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse;
- To develop and promote effective working relationships with other agencies, especially the Police and Social Services; and
- To ensure that all adults within our school who have access to children have been checked as to their suitability.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance. Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We

comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

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 Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, religion, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's

proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment;

- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse;
- 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; and
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage;
- The Academy Trust Governance Guide, which sets out governor and trustee responsibilities for safeguarding

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

3. 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 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
- Taking action to enable all children to have the best outcomes

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

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

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. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children include everyone under the age of 18.

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

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

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

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

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

4. 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 and/or disabilities (SEND) or health conditions (see section 10);
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language (EAL);
- 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 Female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation;
- Are asylum seekers;
- Have medical conditions:
- Are at risk due to either their own or a family member's mental health needs;
- Are looked after or previously looked after (see section 12);
- Are missing or absent from education for prolonged periods and/or repeat occasions; and
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to any extended school events, trips and visits 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, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy;
- Anti-child-on-child abuse and bullying policy;
- Pastoral support system; and
- Planned programme of relationships, sex and health education (RSHE), 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, online issues, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support and;
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually.
- Confirm that at the beginning of each academic year to say that they have reviewed the guidance annually.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online); and
- Provide a safe space for pupils who are LGBTQ+ 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, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy and the online policy, which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education;
- Be aware of the school's unauthorised absence procedures and children missing education procedures;
- The early help assessment 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;
- The process for community-based Family Help assessments;

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines);
- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm;
- The importance of reassuring victims that they are being taken seriously and that they 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 mental health 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
- The children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time; and

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

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

5.2 The Designated Safeguarding Lead

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

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

When the DSL is absent, the deputy/deputies will act as cover with the support of the headteacher.

If the DSL and deputies are not available or absent, we have cover arrangements in place. This includes:

- An internal safeguarding procedure where staff will inform the CEO or another member of SLT who will deal with the safeguarding concern and/or contact the safeguarding team for further guidance/support where necessary.

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

- The DSL is responsible for promoting a strong safeguarding culture across the school, ensuring staff understand emerging risks, statutory changes, and internal procedures:
- The DSL will ensure that safeguarding information is shared promptly, proportionately, and securely with relevant agencies, in line with statutory guidance and local protocols.
- 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

- Georgia Strong is the Reach Schools Prevent lead and will make sure that staff have appropriate Prevent training and induction;

- Have a good understanding of harmful sexual behaviour; and

- 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;

- Ensure that child protection files are kept up to date;

- Where children leave the school, ensure their child protection file is transferred to the new school;and

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

5.3 The trustees and local governing bodies

The trustees and local governing bodies 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 Headteacher 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; and
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners;
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils;
- Ensure the school has appropriate cyber security systems in place;
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;

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

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

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; and

- 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 one of the co- headteachers, where appropriate (see appendix 3).

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

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

5.4 Co-Headteachers

The Co-headteachers are responsible for the implementation of this policy, including:

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

    - Are informed of our systems that 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 and neglect

- Communicating this policy to parents/carers when their child joins the school and via the school website;
- 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);
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this;
- Ensuring the relevant staffing ratios are met, where applicable;
- Making sure each child in the Early Years Foundation Stage is assigned a key person;and
- Overseeing the safe use of technology, mobile phones and cameras in the setting

5.5 Virtual school heads

Virtual school heads(VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

- VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).
- They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

We recognise that all matters relating to child protection are confidential. The DSL team, or other senior staff will disclose any information about a student to other members of staff on a need to know basis only.

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security protected school equipment. All paper documents with pupils' personal information must be put in confidential waste when no longer required. If a member of staff is in any doubt about the storage of sharing of information they must seek guidance from a member of the Leadership Team. Any media or legal enquiries must be passed to the Co-headteacher.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets.

Staff note that:

- Timely information sharing is essential to effective safeguarding;
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required;
- 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;
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk; and
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interest.

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

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

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

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;and
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities;
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information;
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy); and
- When a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school

or college in advance of a child leaving.

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

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 early help for a child who:

- Has a disability/medical need
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into antisocial 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 exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- 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 (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- 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

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

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

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

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

In the event of any safeguarding concern where the child is in immediate risk of harm and danger the first step is to find one of the members of the safeguarding team.

If there is no member of the safeguarding team available, a co-headteacher should be contacted for all concerns. If a member of staff has a concern and it is out of hours then staff members need to make contact with either the DSL or Co-Headteacher.

All safeguarding concerns should be promptly recorded on CPOMS after speaking to the member of the safeguarding team.

Deciding whether to refer to social care

A member of the DSL team will make referrals to social care. However, it is important to realise that any member of staff can make a referral if they consider that there is any chance a child could come to significant harm. If a member of staff is not confident in their next

steps, then they can speak to the safeguarding team, or speak anonymously to the NSPCC on 0808 800 5000 and they will help the member of staff to decide. The best outcome for a child needing to be referred.

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

Hounslow Procedures:

If you think that a child or young person is at risk from abuse or neglect, contact Hounslow children's services immediately.

If you feel urgent action is needed contact the police on 999.

If you suspect ill treatment of a child or young person you can:

- Contact Children's Services on 020 8583 6600 option 2
- Their office is open Monday to Thursday 9am to 5pm, Friday 9am to 4.45pm
- Telephone 020 8583 6600 option 1
- Out of hours (after 5pm weekdays or weekends) call 020 8583 2222 and ask to speak to the duty social worker.

You do not have to give your name if you do not want to and your conversation will be treated confidentially.

To report child abuse to your local council:
https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- 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;
- 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; and
- Record on CPOMS (within 24 hours) and pass it on to the DSL (as soon as possible). 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; and
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

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

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- 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 disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

Any member of staff who suspects a pupil is at risk of FGM a pupil **age 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures. This will include contacting Children's Services on 020 8583 6600 and calling Call the FGM helpline on 0800 028 3550 or emailing fgmhelp@nspcc.org.uk.

7.4 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)

Figure 1 below 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.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or 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.

Early Help

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

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

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

Hounslow Early Help:

Early Help Hub Children's, Health and Adults' Services 5th Floor, Hounslow House Bath Road, Hounslow, TW3 3EB

- Opening Hours: 9am to 5pm Monday to Friday
- Tel: 020 8583 6653
- Email: childrensocialcare@hounslow.gov.uk

Referral

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

If you make a referral directly, you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must 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 have the right to complain about Children's services:

- if we have been refused a service
- if we are unhappy about the service we received

Escalation Process

- Tell the manager of the service, or call the customer relations team on 020 8583 333;
- Explain what you are unhappy about and what you would like to happen to put it right;
- They will contact you within three working days to talk about your complaint;
- You should receive a written response to your complaint in 10 to 20 working days;
- If you are not satisfied with the response call the customer relations manager on 020 8583 3333;or
- For further Information about the Children's Statutory Complaint process.

7.5 Concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include 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, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk Note that this is not for use in emergency situations.

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

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

7.6 Concerns about mental health

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one (for example self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

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

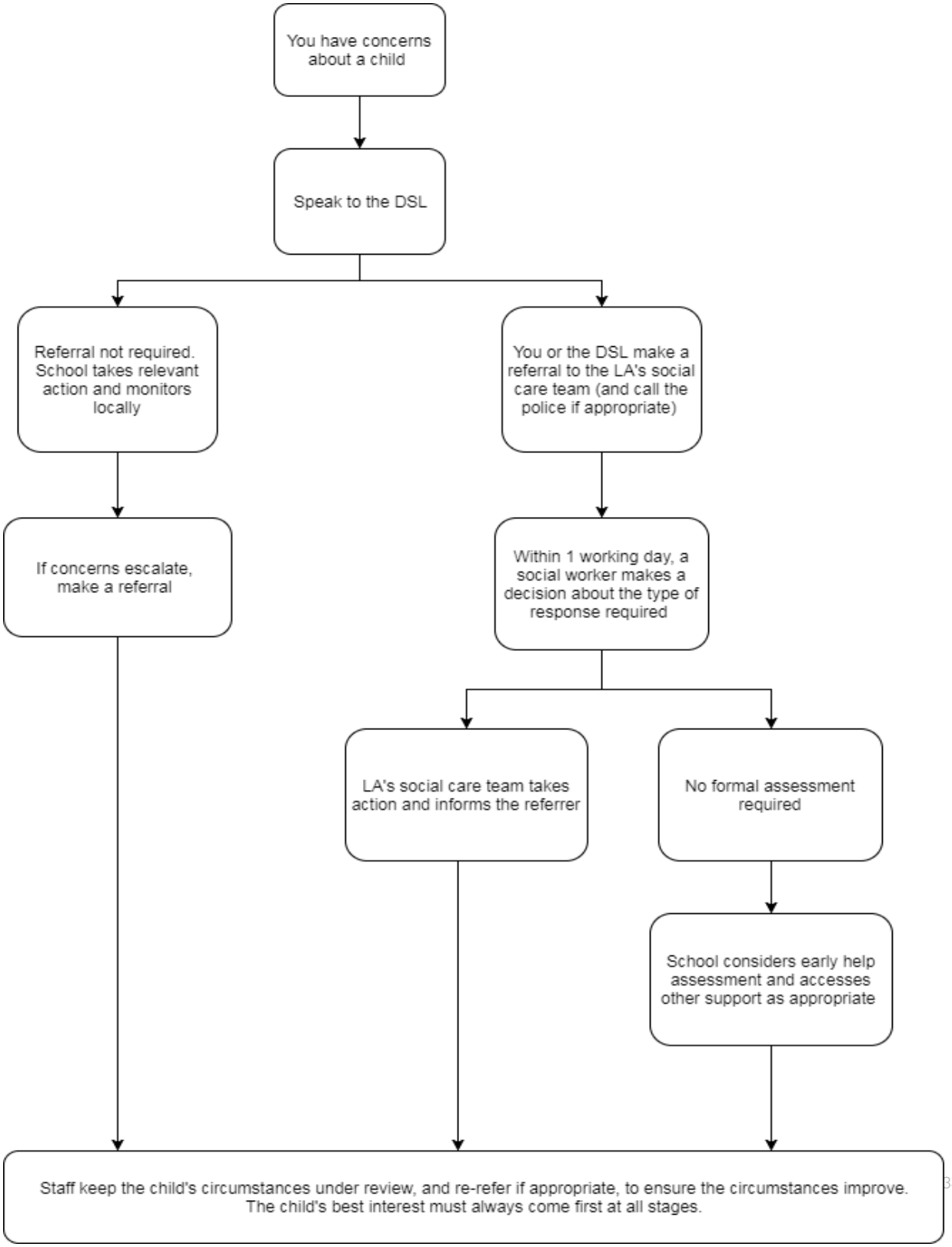
Please see the Department for Education guidance on mental health and behaviour in schools for more information.

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

(Note – if the DSL is unavailable, this should not delay action)

Reach Schools

CHOICE & OPPORTUNITY FOR EVERY CHILD



7.7 Concerns about a staff member, volunteer or contractor

If you have concerns about a member of staff (including a, volunteer, trainee teacher or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to one of the Co-headteachers as soon as possible. If the concerns/allegations are about one of the co-headteacher, speak to the chair of the governing body, Juliette Cammaerts.

One of the Co-headteachers/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a volunteer, trainee teacher or contractor) to the co-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.

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

7.8 Allegations of abuse made against another pupil

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

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. 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 sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 4 for more information about child-on-child abuse.

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

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

- You must record the allegation and tell the DSL, 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;
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s);and
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making 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 7.10 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;
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment;
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes;
- 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;and
- 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;and
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

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

Disciplinary action can be taken while other investigations are going on, such as 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

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident:

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not:**

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

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the

safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

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

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming); and

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through either our dedicated ward officer or if they are not available, 101.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Team Reach lessons. 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; and
- 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; and
- The receipt of such images.

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

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

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

7.10 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; and
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

All pupils are encouraged to speak to staff that they feel comfortable with either face to face or via email. We have an open door policy at our school so pupils are able to report concerns at a time that suits them and with a staff member of their choice. We make pupils aware of the reporting systems and processes, through discussion in form time and Team Reach lessons. All pupils who report will be offered follow up support, which may be a Place2Talk session.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children 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 in place to ensure the online safety of pupils, staff, volunteers and governors;
- 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');
- In line with national expectations, Reach Schools operates a mobile-phone-free environment for pupils unless a very specific, justified exception has been approved by the Co-headteacher or DSL. This approach is designed to reduce distraction, minimise online safety risks, and support positive behaviour and learning.

- 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, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

Contact – being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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 – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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; and
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are 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;

- Educate parents/carers about online safety via our website, communications sent directly to them and during 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, 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;

- 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;

- Reach Schools will conduct a formal review of its filtering and monitoring systems at least annually, in line with strengthened expectations in KCSIE 2026. We will maintain clear records of these reviews and ensure that any identified improvements are implemented promptly to maintain a safe digital environment for pupils and staff.

- Reach Schools recognise that governors hold strategic responsibility for ensuring that filtering and monitoring arrangements are effective, appropriate, and regularly evaluated.

- 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;
- 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;and
- 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 and mobile phone policies which can be found on our website

8.1 Artificial intelligence (AI)

Reach Schools recognises the emerging risks associated with artificial intelligence, including deepfakes, nudification apps, AI-generated sexual imagery, and AI-enabled impersonation or grooming. These risks form part of the school's online safety provision and will be addressed through curriculum content, staff training, and technical safeguards. Staff will be supported to identify, report, and respond to incidents involving AI-generated harm, and pupils will be taught how these technologies can be misused and how to seek help if they experience or witness AI-related abuse.

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 Gemini.

Reach Schools recognises 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.

Reach Schools will treat any use of AI to access harmful content or bully pupils in line with this policy, our artificial intelligence and our Anti-child-on-child and bullying policy.

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

requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we or Children's Services believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so and follow their advice.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers 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; and
- Meet with the alleged perpetrator'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).

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their

peers. Additional barriers can exist when recognising abuse, exploitation and neglect 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 SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse;
- The need for intimate care or that these children are isolated from others;
- That these children are more likely to be dependent on adults for care; and
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so.

We offer extra pastoral support for these pupils. This includes:

- Support from the Inclusion team;
- Support/mentoring from our tutor fellows; and
- Access to our Place2Be counselling service.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or

outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

12. Young Carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. 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; and
- The provision of pastoral and/or academic support.

14. 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; and
- The DSL has details of children's social workers and relevant virtual school heads

We will appoint a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher 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; and
- 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.

15. Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. Reach Schools will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

From Phase 2 and above pupils are not allowed into toilets, changing rooms, showers or designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff 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).

17.2 Other complaints

All complaints need to follow the complaint procedure, please refer to the complaints policy for detailed information on this, this can be found on our website.

17.3 Whistle-blowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitudes and actions of colleagues. The whistleblowing policy can be found on our website.

18. Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved; and
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily 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.

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

In addition, 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.

All Records are electronically based with student concerns being recorded on CPOMs and staff concerns being recorded on Staffsafe.

All records are kept secure as both CPOMS and Staffsafe allow the DSL to securely control who has access to what information and when. Therefore all records are kept confidential.

We will archive the electronic records when staff and children leave the school. If a child leaves the school all electronic files will be transferred securely to the new school.

We share information with other agencies as and when this is appropriate, in line with your local safeguarding procedures. For example, we will share information with Children's Services when we feel there is a risk to the students. Where possible, we will share

information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When we are sharing or requesting personal information from someone, we are clear of the basis upon which you are doing so. Where we do not have consent, we are mindful that an individual might not expect information to We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved; and
- A note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child on CPOMS.

Any non-confidential records will be readily 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.

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.

19.Training

19.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, 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 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;and
- 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 becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

19.2 The DSL and deputies

The DSL will undertake 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.

19.3 Trustees and Governors

All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge; and
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

19.4 Recruitment – interview 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.

See appendix 2 of this policy for more information about our safer recruitment procedures.

19.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

20. Monitoring arrangements

This policy will be reviewed annually by the Trust DSL Lead. At every review it will be approved by the Board of Trustees.

21. Links with other policies

This policy links to the following policies and procedures :

- Behaviour;
- Artificial intelligence policy;
- Anti-child-on-child and bullying policy;
- Sexual Harassment and Violence;
- Complaints;
- Health and safety;
- Attendance;
- Relationship, Sexual health and Education;
- First aid; and
- Staff Handbook and Code of Conduct

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both within the Academy environment and when away from the school when undertaking trips and visits.

Our policy on physical intervention by staff is set out in a separate policy and acknowledges that staff must only ever use physical intervention as a last resort and that at all times it must be the minimal force necessary to prevent injury to another person. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection procedures. Any physical interventions will be recorded on CPOMS, our confidential management information system.

Our policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

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

Reach Schools

CHOICE & OPPORTUNITY
FOR EVERY CHILD

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Appendix 1: Types of abuse

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

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

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

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

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 cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

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

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

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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.

Appendix 2: Safer recruitment policy

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 Trust''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; and
- 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);and
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Advertisements for posts – whether in newspapers, journals or on-line will include the statement:

"Reach Schools is committed to safeguarding and promoting the welfare of children and young people. In order to meet this responsibility all candidates will be subjected to a rigorous selection process to discourage and screen out unsuitable applicants."

Prospective applicants will be supplied with, or pointed to, the following:

- job description and person specification;
- the school's Safeguarding and child protection policy (this document);
- the selection procedure for the post;
- an application form.

All prospective applicants must complete, in full, an application form containing questions about their academic and employment history and their suitability for the role. Applicants will also be asked to provide details of their online profile, including account names and social media handles so that online searches can be carried out on shortlisted candidates (see section 4 for more information). This information must be provided by the applicant in order for the application to be accepted.

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; and
- 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 (self-declaration of criminal records);
    - 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; and

    - Any relevant overseas information

- Sign a declaration confirming the information they have provided is true

We will also carry 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.

Where necessary, referees will be contacted by telephone or e-mail in order to clarify any anomalies or discrepancies.

Where necessary, previous employers who have not been named as referees will be contacted in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

Seeking references and checking employment history

We will seek to obtain references before the 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 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; and

- 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; and
- 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.

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 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 the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check:

    - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
    - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school

- 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;
- 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;and
- 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

Management positions are most likely to include, but are not limited to, headteachers, and deputy/assistant headteachers.

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. When 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 frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or

- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

Online searches

In addition to the checks set out above, we reserve the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the school. In accordance with paragraph 225 of KCSIE this will include online searches on shortlisted candidates (online searches). The online searches the school carries out may include searches of internet search engines, websites and social media platforms. Applicants are asked in the application form to provide details of their online profile, including account names and social media handles. This information will be used to carry out online searches. Applicants are not required to provide account passwords or to grant the school access to private social media accounts .

Online searches may be carried out at the shortlisting stage or after an offer of employment has been made (but prior to work commencing). The school will not carry out online searches as part of its initial sift of applications.

The school will determine how it approaches online searches on a case by case basis. However, all applicants for a role at the school will be treated consistently with regard to online searches.

Wherever possible online searches will be undertaken by a person who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the school is looking for any publicly available information about an applicant that:

- may be relevant to their suitability to carry out the role for which they have applied;
- may be relevant to their suitability to work at the school or in an education setting;
- is of a safeguarding nature; and/or
- may have an impact on the school's reputation (whether positive or negative).

Any information generated from online searches will be entered in an 'Online search results record'. Where online searches are undertaken on shortlisted applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted

applicants at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to employment commencing. All offers of employment will be conditional upon the school being satisfied that the successful applicant is suitable to work at the school in light of any information generated from online searches.

In evaluating any online information for relevance the school will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the school or in an education setting;
- whether the information could have an impact on the school's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the school's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the school will retain information generated through online searches for the duration of the individual's employment and in accordance with its Retention of Records Policy after employment ends.

For unsuccessful candidates, the school retains the information generated from online searches for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.

In fulfilling its obligations to carry out pre-employment checks the school does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age.

Existing staff and volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. 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
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Disclosing previous convictions and Enhanced DBS checks

There are currently no statutory requirements for schools to renew employee's DBS, however at Reach Schools we think it is important to check and renew DBS every 5 years as a minimum requirement. We think this is best practice as we believe that DBS checks in education are a vital safeguarding tool that helps to ensure the safety and wellbeing of children and young people.

We will renew a DBS check earlier than the stated 5 years if there has been a break in service of more than three months or the school has concerns about a member of staff's

suitability to work with children. We will record all information on the checks carried out on Staff Safe. Copies of these checks, where appropriate, will be held in individuals' personnel files or securely held on Staff Safe . We follow requirements and best practice in retaining copies of these checks.

Important legal changes came into force on the 28th November 2020 to take into account a judgement by the Supreme Court:

"The amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) provides that when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the Ministry of Justice website."

This means that:

- Cautions given to under 18s are no longer legally disclosed;
- The multiple conviction rule has been removed so that each offence should be considered individually; and
- Applicants must be told how to get independent, confidential advice on which cautions or convictions they must disclose and be given time to obtain advice. Enhanced DBS certificates will always include the following records no matter when they were received:
- All convictions for specified offences
- Adult cautions for specified offences
- All convictions that resulted in a custodial sentence.

In line with these changes the process is:

After the shortlisting stage, before the interview, candidates will be given the opportunity to disclose their criminal record. Candidates will be directed to seek advice and guidance on disclosing a criminal record from Nacro and Unlock.

All cases will be examined on an individual basis, taking the following into consideration:

- Whether the conviction is relevant to the position applied for;
- The seriousness of any offence revealed;
- The age of the applicant at the time of the offence(s);
- The length of time since the offence(s) occurred;
- Whether the applicant has a pattern of offending behaviour;
- The circumstances surrounding the offence(s), and the explanation(s) offered by the person concerned and
- Whether the applicant's circumstances have changed since the offending behaviour.

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.

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 includes contractors who are provided through a PFI or similar contract). 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, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

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. When 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 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Obtain references for volunteers before they are recruited

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When 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 trustees

All governors and trustees 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 proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [only if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

When 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.

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.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the

specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: Allegations against staff (including low-level concerns)

Allegations that may meet the harm threshold

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and 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); and

- **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;
- 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 considering what other support is appropriate;
- 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 (only in relation to their child – no information will be shared regarding the staff member); and
- 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 Teaching Regulation Agency.

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

Additional considerations for all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher 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; and
- 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

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

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

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

Specific actions

Action following a criminal investigation or prosecution.

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

Conclusion of a case where the allegation is substantiated.

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to 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; and

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and 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; and
- How to manage press interest if, and when, it arises

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the 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; and
- 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.

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including 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; and
- 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; and
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

The Co-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 code of conduct. The co-headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

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

Records will be:

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

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

References

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

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

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Appendix 4: Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images

- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person
- The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
- Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

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;
- Are at risk of forced marriage or FGM;
- 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; and

- 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 and neglect, 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 absent, 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 suffering or likely to suffer from harm, or in immediate danger.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery. Reach Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility. Reach staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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; and
- Not taking part in education

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

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

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. Most sexual abuse is committed by individuals known to the victim.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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

- Having an older boyfriend or girlfriend; and
- Suffering from sexually transmitted infections or becoming pregnant

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

Reach Schools recognises that child-on-child abuse can include harmful sexual behaviour, sexual harassment, sexual violence, online sexualised behaviour, coercive behaviour, and incidents involving weapons. 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 2.

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.

Reach schools recognise that Serious violence often occurs in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. It may involve:

- Physical assault
- Carrying, threatening with, or using weapons

Any concerns relating to serious violence will be treated as a safeguarding concern.

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;

- Misogyny/misandry is a form of inappropriate behaviour that requires early intervention to prevent escalation:
- 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 making or sharing of nudes and semi-nudes, including those generated using AI;
- 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; and
- 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 nude or semi-nude images , especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If 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, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Reach Schools recognise that sexually harmful behaviour exists on a continuum, ranging from developmentally expected and socially appropriate behaviours through to inappropriate, problematic, abusive, and violent behaviours. Reach Schools recognise that behaviour may escalate if it is not addressed.

Reach Schools recognises that children and young people may display behaviours at different points along this continuum, and that not all sexualised behaviour is immediately indicative of abuse or exploitation. However, any behaviour that causes concern, discomfort, coercion, distress, or risk to another child must be taken seriously and responded to in line with our safeguarding procedures. Reach Schools uses the Hackett continuum model to support staff in distinguishing between developmentally inappropriate, problematic, abusive and violent behaviour.

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

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into 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.

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.

Section 7.3 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; and
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable;
- 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; and
- 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; and
- 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/carers 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; and
- 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 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 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; and
- 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 the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

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.

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners 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 Facebook or Twitter
- 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 section 7.5 of 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 behaviour policy and our online/e-safety policy.

In Hounslow, a Prevent priority area, the Prevent leads can provide support:

Joan Conlon Prevent Lead

Email: joan.conlon-GCSX@hounslow.gcsx.gov.uk

Mobile 07817 079190

Najeeb Ahmed Home Office Approved Intervention Provider and Prevent Coordinator Email: najeeb.ahmed-GCSX@hounslow.gcsx.gov.uk

Mobile 07890 540433

Reach Schools
CHOICE & OPPORTUNITY FOR EVERY CHILD

Sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB 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)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience 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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

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
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, 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, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and will be given a safeguarding leaflet on arrival.

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 electronically and wear a visitor's badge.

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)

All other visitors, 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.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contact the parents;
- Contact the emergency contact on schoolbase; and
- A member of staff will stay with the child until they are collected.

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:

- Contact and inform parents;
- SLT will try and look for the child ;
- The DSL/SLT will inform the police on 101 if we can not immediately find the child ;
- All incidences of missing pupils will be reported on CPOMS; and

- We will follow up with the child/family if there is anything we can do in the future to prevent this, including a potential risk assessment.