







# St Mary Magdalene C of E School with Christ Church C of E Primary School

## Safeguarding/Child Protection Policy

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| This policy was:   | Written in  |   |   |  |
|  | Updated in  | September 2025  |   |  |
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|  | Approved by   | Mr Patrick Elliott  | Mrs J Eastaugh  |  |
|  |   | <i>Co-Chairs of Governors</i>   |   |  |
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| <i>Federation Co-Headteachers</i>  |   |   |   |  |
|  |  |   |   |  |

|  |   |
|--|---|
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## 1. Policy Statement

As a Federation, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We endeavour to provide a safe and welcoming environment where children and adults feel respected and valued.

We maintain an attitude of '**it could happen here**' where safeguarding is concerned and promote a culture of openness where children have a voice and are listened to.

This policy provides staff, volunteers and governors with the framework required in order to keep children safe and secure in our schools. Its purpose is also to inform parents and carers of how we will safeguard their children whilst they are in our care.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Greenwich Safeguarding Children's Partnership (GSCP) and locally agreed procedures.

This policy takes account of the 'Keeping Children Safe in Education' statutory guidance and makes frequent references to it. [KCSIE 2025](#)

This policy provides information regarding different types of abuse and encompasses other statutory and non-statutory documentation and legislation (shown in Appendix 2 of this policy).

The policy outlines the procedures that the school has in place to ensure all children in our care receive effective support, protection and justice. Preventative education is effective within our whole school approach and prepares children for life in modern Britain with a zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

***The policy is hyperlinked to relevant statutory documentation and guidance to provide easy access for additional information/clarification.***

## 2. Definition of Safeguarding

As defined in statutory guidance

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

## 3. Aims and Values

### 3.1 Aims

- To ensure all staff are aware of their statutory duty to safeguard the children in their care.
- To ensure staff are trained to recognise and report safeguarding concerns, ensuring appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- To support the development and understanding of children in how to protect themselves from potential abuse and equip them with the skills

needed to support their mental wellbeing.

### **3.2 Values**

- To uphold children's rights to feel safe and protected from harm
- To work effectively in partnership with other agencies for the benefit of children
- To ensure the interest of the child is paramount in all safeguarding decisions made and actions taken<sup>1</sup>.

## **4. Roles and Responsibilities**

### **4.1 The Governing Body's Roles & Responsibilities<sup>2</sup>**

4.1.1 Governors promote a child-centred whole school approach to safeguarding which underpins all relevant aspects of process and policy development, and promote a culture of respect, where staff and children are listened to, and all concerns raised are followed up.

4.1.2 The Governing body has nominated a governor who will be responsible for Safeguarding and Child Protection and has ensured that all governors (including those new to the role) have a clear understanding of their statutory responsibility to safeguarding those who use the Federation.

#### **4.1.3 The Governing Body will ensure that:**

- An annual review of the school's safeguarding policy procedures adheres to the Royal Borough of Greenwich guidance and locally agreed interagency procedures.
- The safeguarding policy is made available publicly, on the Federation website or on request.
- The safer recruitment procedures as outlined in KCSIE part 3 are robustly implemented and all appropriate checks are carried out on staff and volunteers who work with children.
- The Federation has a behaviour policy which includes measures to prevent bullying of all types.
- A senior member of the leadership team across the Federation is designated to take lead responsibility for dealing with safeguarding and child protection (including online safety). To provide advice and support to other staff, liaising with the local authority, and working with other agencies. The Designated Safeguarding Leader (DSL) will receive appropriate training, funding and time to carry out the role effectively as outlined in his/her job description.
- Annual staff training is prioritised to ensure all staff are equipped to carry out their responsibilities for child protection effectively. Also, that all temporary staff and volunteers who work with children are made aware of the Federation's arrangements for child protection and their responsibilities.
- The expectations of safeguarding responsibilities contained within the Teacher standards and the Staff code of Conduct Policy are met.
- The Federation has clear systems and processes in place for identifying

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<sup>1</sup> The school will work openly with parents/carers as far as possible, but it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

<sup>2</sup> Governing bodies and proprietors have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to [KCSIE 2025](#) (Part 2 and 3) guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

possible mental health concerns, including routes to escalate response and clear accountability systems<sup>3</sup>.

- There are robust systems in place for the induction of new staff on the Federation's safeguarding procedures and relevant policies (CP policy, behaviour policy, staff code of conduct, procedures to keep children safe when using online technology, procedures regarding children missing education and the role of the DSL).
- An appropriate whistleblowing policy/procedure is in place to encourage any staff member or volunteer to report concerns regarding safeguarding practice in the Federation.
- The Federation has clear procedures for dealing with allegations of abuse made against members of staff and volunteers that comply with guidance from the local authority and locally agreed interagency procedures.
- Procedures are in place for regular evaluation of the effectiveness of safeguarding systems, including adherence to safer recruitment procedures and checks on the effectiveness of online safety (including the filtering and monitoring strategies<sup>4</sup> to ensure the standards are being met), as outlined in [KCSIE 2025](#) (para 141- 143). See also *Appendix 7 of this policy*.
- With staff welfare in mind, the Governing Body will consider the necessity and appropriateness of arranging for 'Safeguarding Supervision' for the DSLs and Deputy DSLs within the school.

#### 4.2 Headteacher/Principal's Role and Responsibilities

In line with the statutory guidance (KCSIE 2025), the Headteacher/Principals will ensure that systems and procedures are in place to support all staff to understand their individual and collective roles in safeguarding and promoting the welfare of children.

The Headteacher/Principals will ensure:

- The policies and procedures adopted by the governing body or proprietor are fully implemented and followed by all staff.
- The DSL has a clear and concise job description, explicitly referring to the role of taking **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- Sufficient resources and time are allocated to enable the DSLs and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies, where appropriate.
- There are arrangements in place for DSLs availability to cover any out of hours or out of term time activities taking place.
- Induction procedures are robust and meet the requirements outlined in [KCSIE 2025](#)
- A barred list check is completed, and a risk assessment is in place, to ensure any individual who starts before a DBS certificate is received is appropriately

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<sup>3</sup> Further information can be found in the [mental health and behaviour in schools' guidance](#)

<sup>4</sup> [Online filtering and monitoring standards for schools updated 2025](#)

supervised.

- Procedures are in place to refer to DBS any person dismissed or removed from their role due to safeguarding concerns.
- The Federation will take the lead role in the investigation of any allegation concerning a supply teacher in post and will keep the supply agency informed throughout.
- The Federation is responsible for the pupils they place in any alternative provision and for ensuring the provider has appropriate safeguarding procedures in place.<sup>5</sup>
- The Federation is satisfied that any visitors attending in a professional capacity or organisations using the school premises have appropriate safeguarding procedures in place.
- The Federation curriculum provides regular opportunities for children to learn about personal safety and how to protect themselves from harm in an age-appropriate way.

The Alternative Provision (AP) section has been expanded for clarification, and to reflect existing AP guidance (KCSIE 2025 update):

When a pupil is placed with an AP provider, settings are directed to:

- Obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment
- Receive notification of any arrangements that may put the pupil at risk
- Remain fully aware of where a pupil is based during school/college hours
- Review AP placements at least half termly
- Review and potentially terminate any placements where safeguarding concerns arise.

#### **4.3 The Designated Safeguarding Lead's Role and Responsibilities**

The DSL will act to meet the requirements of the role, as outlined in [KCSIE 2025 Annex C](#), which is summarised as: taking **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). Requirements of the role include (but is not limited to):

- Referring cases of suspected abuse, neglect, radicalisation or allegations to the relevant statutory agencies (children's social care, the police or the Channel programme).
  - Act as a source of support, advice and expertise to staff within the Federation.
  - Liaise as appropriate with staff, including IT technician, the SENCo, the designated teacher for LAC and the named person with oversight for mental health.
  - Promote positive engagement with parents and/or carers to safeguard children and support families facing challenging circumstances.
  - Champion educational outcomes for vulnerable children and those who have or have had a social worker.
  - Have procedures in place to re-assess concerns when a child's situation fails to improve.
  - Ensure procedures and guidance are in place to ensure all searches of pupils
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are witnessed (including the appointment of an appropriate adult for strip searches <sup>6 7</sup>) and all searches for prohibited items are logged on the school safeguarding reporting system. See also guidance in appendix 6.

#### 4.3.1 Record keeping

- Maintain clear, concise and confidential records of the **concern, action taken and outcome**
- Ensuring safe and secure transfer of records when a child leaves the Federation.

#### 4.3.2 Promoting a culture safeguarding and training

- Maintain his/her own secure and up-to-date knowledge of safeguarding developments and share as appropriate with staff in line with advice from the Greenwich Safeguarding Children's Partnership (GSCP).
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as the Royal Greenwich Early Help Guidance and FaASS referral procedures.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the Federation's safeguarding/child protection policy and procedures, especially new or part-time staff.
- Ensure all staff have robust induction training, covering safeguarding/child protection, and are confident to recognise and report any concerns about children's safety and welfare immediately as they arise.
- Promote a culture of listening to children and building trusting relationships to support those children who find difficulty in approaching staff with a concern.
- Ensure all staff are aware of the additional risks that children with Special educational needs and disabilities face online and offline.
- Ensure all staff are aware of the guidance [What to do if you are worried a child is being abused](#)
- Ensure staff are aware of contextual safeguarding and extra-familial harm from the influence of factors outside of school or in the child's own family, including vulnerability to possible abuse, exploitation and youth violence.
- Provide feedback and reassurance to staff who have raised a child protection concern

### 4.4 The Role & Responsibilities of Staff and Volunteers

- 4.4.1 At the start of the academic year, (or commencement of employment if starting at the school during the academic year), all staff will sign a declaration to indicate that they have read and understood 'Keeping Children Safe in Education' part 1 and the school's Safeguarding/child protection policy. (Those working directly with children will read 'Keeping Children Safe In Education' Annex B.) In signing this, staff are indicating that they understand their statutory

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<sup>6</sup> [PACE Code C 2019](#)

<sup>7</sup> [searching screening and confiscation July 2022](#)

duty to safeguard children and to report any concerns.

- 4.4.2 All staff will familiarise themselves with the signs of abuse, neglect and exploitation (Appendix 1, attached) so that they are able to identify children who may be in need of help or protection.
- 4.4.3 All staff will ensure they understand and can follow the school's procedures for reporting concerns
- 4.4.4 Staff members will maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- 4.4.5 All staff will:
- Be aware that mental health problems can be an indicator that a child has suffered abuse, neglect or exploitation
  - Recognise that a disclosure may come directly from the child, or from a third party, e.g., friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of signs, symptoms and knowledge of possible indicators of abuse
  - Recognise that child-on child abuse (all forms, including physical and sexual violence and harassment, sexting, 'up skirting'<sup>8</sup>, bullying and initiation/hazing) must not be downplayed and must be taken seriously and appropriately reported
  - Be aware of indicators which may signal involvement with violent crime (absences from Federation, changes in friendship groups or relationships with older individuals/groups, decline in performance or unexplained injuries). Also, the increased likelihood of involvement of being male or permanently excluded from the Federation.
- 4.4.6 Staff will take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour (*without promising they will not tell anyone*). Ensuring the victim or person disclosing is not given the impression they are causing a problem by reporting a concern or abuse.
- 4.4.7 Staff will read carefully any documentation provided by the DSLs to update their safeguarding training.
- 4.4.8 All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them
- *The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).*

## 5. Strategies and Procedures to Support Safeguarding

### 5.1 Promoting Equality

- 5.1.1 Some children have an increased risk/vulnerability to abuse. They can face additional barriers with respect to recognising or disclosing concerns. The school

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<sup>8</sup> Changes to the Voyeurism (Offences) Act 2019 criminalises the act of 'up skirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission.

is committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of additional barriers they may face.

Children who may be more vulnerable include:

- Children who are young carers.
- Children who may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality, including those questioning their gender identity.
- Those who have English as an additional language.
- Children known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Children at risk of FGM, sexual exploitation, forced marriage, or radicalisation/exploitation.
- Children who are asylum seekers or at risk of modern slavery/trafficking.
- Those at risk due to either their own or a family member's mental health needs.
- Children looked after, previously looked after or privately fostered.
- Children frequently missing from education, home or care?
- A child whose parent/carer has expressed an intention to remove them from school to be home educated.

5.1.2 The school recognises that children with special educational needs or disabilities (SEND) or those with certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect or exploitation. Staff recognise the need to:

- Explore the reasons for changes in behaviour, mood and injury rather than assume it is related to the child's disability
- Recognise these children as being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Understand that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Overcome the barriers and difficulties in communication with these children.

## **5.2 Trained Workforce**

5.2.1 All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, to provide them with relevant skills and knowledge to safeguard children effectively.

5.2.2 The designated safeguarding lead (and any deputies) will undergo training to

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[Working together to improve school attendance](#)

provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training and disseminate information to staff.

- 5.2.3 Any newly appointed DSL will attend the DSL one-day training, provided by the Royal Borough of Greenwich Direct Services to Schools, or another accredited training provider, followed by the GSCP Working Together course, before taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.
- 5.2.4 All governors will receive annual safeguarding training to support them in understanding their statutory duties. All new governors will have safeguarding training as part of their induction. The designated Governor for Safeguarding and Child Protection will undertake governor safeguarding training annually.
- 5.2.5 The DSL will maintain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read KCSIE (Part 1 and Annex B).
- 5.2.6 All new members of staff will receive safeguarding training as part of their induction programme.
- 5.2.7 At least one member of every appointment panel will have gained accreditation through Safer Recruitment training (statutory requirement).

### **5.3 Safer Recruitment**

The statutory guidance will be followed (see KCSIE Part 3). This includes:

- References to the Teaching Regulation Agency (TRA) Secure Access system have been removed and replaced. Schools and colleges are now directed to the [Check a teacher's record](#) service to make GTCE, prohibition, direction, restriction, and children's barred list checks.
- In the "Maintained school governors" section, a reference to the Employer Secure Access sign-in portal via the TRA Teacher Services web page has been removed and replaced. To check if a person proposed to be a governor is barred as a result of being subject to a section 128 direction, schools and colleges are directed to the Government's [list of individuals prohibited from managing or governing schools](#).
- Outlining the Federation's commitment to safeguarding and promoting the welfare of children in all advertising.
- At least one safer recruitment trained adult will undertake the shortlisting and be present on any interview panel.
- Providing a copy or link to the school's CP/ safeguarding policy to applicants.
- Requesting a self-declaration at interview so any relevant information can be discussed.
- Seeking references prior to interview and checking employment history.
- Following shortlisting, carrying out pre-employment checks (including the applicant's online presence).
- The shortlisted applicant should be required to sign a hard copy of the application at interview to confirm that the information they have given is true (applicable for online applications received).
- All interview documentation should be retained in the staff file of the successful applicant.
- Recording required information on the school's Single Central Record.

## **5.4 Embedding High Standards of Behaviour**

The Federation's behaviour policy promotes positive and respectful behaviour of staff and pupils.

5.4.1 All Federation staff have been trained to challenge any child-on-child abuse in all its forms. (see Appendix 1 in this policy).

- Staff will challenge derogatory or sexualised language and inappropriate behaviours including that carried out online.
- Deliver a curriculum to educate children about appropriate behaviour and developing positive relationships.
- Staff will tackle prejudice and promote empathy through awareness and acceptance of differences. A whole school approach will be adopted to tackling sexism and challenging homophobic language, banter and racist language.
- Staff will be vigilant concerning all forms of bullying physical, emotional and verbal.

## **5.5 Promoting online safety through a whole school approach.**

- Ensuring staff have appropriate training to understand and reduce the risks associated with content, contact, conduct and commerce (4 C's).
- Actively promoting online safety within policies and procedures in the school and engaging with parents.
- Ensuring the online policy has clarity on the use of mobile and smart technology and address is the risks associated with the 4 C's above.
- There are appropriate filtering and monitoring systems in place with regular review to determine their effectiveness (meeting the DFE filtering and monitoring standards requirements).

## **5.6 Referral to Family and Adolescent Support Services (previously called Early Help)**

Royal Greenwich FaASS supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm. FaASS is focused on developing and breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Staff are alert to the potential need for FaASS for a child who:

- is disabled and has specific additional needs, including certain medical needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- is showing early signs of abuse and/or neglect.

Further information can be found from:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

## 5.7 Recognising Abuse and Taking Action

- 5.7.1 All staff and volunteers must be aware that the main categories of abuse are:
- Neglect
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
- 5.7.2 All staff and volunteers must act in accordance with this policy if a child presents with indicators of abuse.<sup>10</sup>
- 5.7.3 Staff will follow the guidance in this policy for dealing with a disclosure or reporting concerns (see Appendix 3).
- 5.7.4 If any member of staff has a concern about a particular child in their care, they must immediately report their concerns to, and seek advice from the Designated Safeguarding Lead, or in their absence, the Deputy Designated Safeguarding Lead. Staff must record of their concerns on CPOMS.
- 5.7.5 All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow referral, along with the role they might be expected to play in such assessment.
- 5.7.6 Staff will follow the guidance in Appendix 3 of this policy if a child discloses that he/she has been abused in some way.
- 5.7.7 Staff must be aware that an incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or personal expressions/comments when recording the disclosure.
- 5.7.8 The DSL (or in his/her absence, the Deputy DSL) will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

**MASH Consultation Line for professionals Tel- 0208 921 2267 or contact**

**RBG Schools' Safeguarding Officer on 0208 921 3930.**

- 5.7.9 Referrals will be made as soon as possible by telephone **and the appropriate forms completed and sent at the same time.** Referrals to Children's Social Care must be made to the Multi Agency Safeguarding Hub (**MASH**) Tel 0208 921 3172 or complete an [Inter-Agency Referral Form](#) for Early Help or Children Social Care Services.

### **Multi Agency Safeguarding Hub Children's Services'**

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<sup>10</sup> See Appendix 1 in this policy for brief details of types of abuse and [KCSIE 2025](#) (part 1 and Annex B for greater detail).

**Safeguarding and Social Care, 1<sup>st</sup> Floor**  
**The Woolwich Centre,**  
**Wellington Street,**  
**Woolwich, London**  
**SE18 6HQ**

5.7.10 If the DSL has raised a safeguarding concern but does not feel that appropriate action has been taken by Royal Borough of Greenwich Children's Services, he/she should use the RBG Safeguarding Children's Partnership escalation policy to take this further. (This is available on the GSCP website, click on the professional's tab)

## **5.8 Reporting Concerns and Record Keeping (see also Appendix 3 )**

5.8.1 The Federation uses an electronic system, CPOMS for recording concerns.

5.8.2 The completed forms/records will be kept for the duration of the child's school career and where a child changes school the forms/records will be forwarded securely to the new setting.

5.8.3 Records will include

- Clear and comprehensive summary of concern
- Details of how concern was followed up
- Note of any action taken, decision reached and outcome

5.8.4 The information contained will be regarded as confidential. Any request for access to the information by non-Greenwich Safeguarding Children Partnership Agencies (e.g., Solicitor, investigating agent) will be referred to the Head Teacher/DSL, who is advised to seek legal advice before acting.

5.8.5 All records of concern and multi-agency involvement should be kept separate from the child's academic records. They must be kept securely, with access only for the DSL, Deputy DSL's and Head Teacher.

## **6. Dealing with Concerns/Allegations Made Against School Staff, Supply Staff, Volunteers and Contractors<sup>11</sup>**

6.1 There are two levels of concern/allegation:

- Allegations that may meet the harm threshold.
- Allegations/concerns that do not meet the harm threshold ('low level concern').

6.2 An allegation that meets the 'harm threshold' is any information which indicates that a member of staff (including supply staff), volunteer or contractor may have:

- behaved in a way that has, or may have harmed a child
- possibly committed a criminal offence against or in relation to a child
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children<sup>12</sup>
- behaved in a way contrary to the Staff Code of Conduct

6.3 Any concern or allegation should be reported immediately to the DSL or Head Teacher. The Head Teacher will follow the guidance in [KCSIE 2025](#) part 4 and

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<sup>11</sup> [KCSIE 2025](#) Part 4 also see Appendix 4 attached to this policy.

<sup>12</sup> This applies to behaviours outside the school environment, in the adult's personal, professional or community life.

outlined in Appendix 4 in this policy.

- 6.4 The Headteacher/Principals will assess whether the concern or allegation meets any of the five criteria set out in section 6.2 (i.e., may meet the harm threshold). If it does, then the Headteacher/Principals shall contact the RBG LADO without delay and provide the LADO with written confirmation of the allegation.
- 6.5 The Headteacher/Principals shall, as soon as possible, following briefing from the LADO, inform the subject of the concern or allegation. (If the concern or allegation involves a supply teacher/staff or contractor, the agency/organisation will be informed and invited to share any information relating to previous concerns or allegations. The Federation's safeguarding procedure will be followed.)
- 6.6 If there is an allegation or concern raised against the Headteacher/Principals, then the Chair of Governors should be contacted. They will inform the LADO and follow guidance in [KCSIE 2025](#) (Part 4) and Appendix 4 in this policy.
- 6.7 Following the outcome of any investigation, there is a legal requirement for employers to make a referral to the DBS, where they consider whether the individual has engaged in conduct that harmed or is likely to harm a child, or if they pose as risk of harm to a child. Consideration must also be made, if it is appropriate, to refer to the Teacher Regulation Agency (TRA) for them to determine if the individual should be banned from teaching.

## **7 Dealing with Concerns/Allegations Against Other Children – Child on Child Abuse**

- 7.1 This policy recognises that children are capable of abusing their peers. Any allegations will be investigated appropriately by reporting concerns to the DSL. Any form of inappropriate touching, physical abuse such as hitting, kicking, shaking, biting and hair pulling, or evidence of 'initiation procedures', sexting, up-skirting (or other inappropriate use of new technology) will be robustly followed up.
- 7.2 All staff should understand, that even if there are no reports of it in their campus, it does not mean it is not happening, it may be the case that it is just not being reported.
- 7.3 All staff understand the importance of challenging inappropriate behaviours between peers. **There will be a zero-tolerance approach to sexual violence and sexual harassment.** Staff will **not** downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys," as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- 7.4 Victims (and alleged perpetrators) of child-on-child abuse or bullying will be supported as for any other form of abuse and in their best interests.
- 7.5 Child-on-child abuse can manifest itself in many ways. The curriculum, and in particular the RSE/RSHE curriculum, provides regular opportunities for the school to help children safeguard themselves from new technology and through learning about relationships and personal safety.
- 7.6 The school provides regular online safety information for children, and they are given key information from CEOP and other online safety sites.

## **8 Confidentiality**

- 8.1 Safeguarding in schools raises issues of confidentiality that must be clearly

understood by all staff / volunteers in the Federation. All staff/volunteers in each campus have responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the DfE guidance (updated May 2024)<sup>13</sup>. It identifies seven golden rules for sharing information. It reminds practitioners that the UK Data Protection Regulation (GDPR), Data Protection Act 2018 (and 2020 update) and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

- 8.2 If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff / volunteer tells the child in a manner appropriate to the child's age / stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.
- 8.3 Staff / volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

## **9 Communication with Parents**

- 9.1 Parents and carers will be made aware of the Federation safeguarding/child protection policy through published information and in initial meetings with the Federation. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation and not a personal decision.
- 9.2 The Governing Body makes this Safeguarding/CP policy available to parents, carers and children through the Federation website. A hard copy is also available on request.
- 9.3 Parents will also have access to information (on the school website and within policy documentation), outlining the school's approach to meeting the Digital Technology Standards for schools including online filtering and monitoring.

## **10 Monitoring and Evaluation**

- 10.1 The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Governing Body. This policy will be reviewed in line with the timescale and details set out on the front cover.
- 10.2 Governors and Federation leaders will implement a strategy to evaluate the effectiveness of safeguarding procedures including ensuring safer recruitment procedures are robustly

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<sup>13</sup> [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers](#)

## Appendix 1: Types and Indicators of Abuse

(To be read in conjunction with 'Keeping Children Safe In Education' [KCSIE 2025](#) Part 1 and Annex B)

**NB. This abbreviated guidance provides a useful reminder of the types and indicators of abuse but MUST be considered within the context of a comprehensive training programme and reference to relevant sections in [KCSIE 2025](#) (Part 1 and Annex B). This guidance is not a substitute for more in-depth consideration of harm.**

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### Definitions of child abuse

'Child abuse, neglect and exploitation' is a generic term encompassing all ill treatment of children, including serious physical and sexual assault as well as cases where the standard of care does not adequately support the child's health (physical or mental) or development needs. The impact of witnessing the ill treatment of others may also cause harm to the child. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm. Child sexual and child criminal exploitation are forms of child abuse.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can occur in families, institutions or community settings. The alleged perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

### 1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or any other act of 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.

**Possible indicators of Physical Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries, including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

### 2. Emotional Abuse

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. It may involve

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

**Possible indicators of Emotional Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical/ mental and/or emotional developmental lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

### **3. Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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. (The sexual abuse of children by other children (child on child abuse) is a specific safeguarding issue in education and staff should be aware of the school's policy for dealing with it.)

**Possible indicators of Sexual Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal

- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD
- Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

#### **4. Neglect**

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Possible indicators of Neglect** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

#### **Additional safeguarding issues<sup>14</sup>**

##### **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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour or irregular attendance suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

##### **Honour Based Abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast

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<sup>14</sup> Further detail to be found in [KCSIE 2025](#) Annex B

ironing. Abuse committed in the context of preserving honour, often involves a wider network or family or community pressure and can include multiple perpetrators.

#### **a) FGM mandatory reporting duty**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Whilst all staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers and other health/social care professionals, 9 Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report this to the police where they discover that 'FGM appears to have been carried out on a girl under 18'<sup>15</sup>.

Possible indicators of Female genital mutilation (FGM)

- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

#### **b) Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 75-80 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmf@fcdo.gov.uk](mailto:fmf@fcdo.gov.uk). See also Royal Borough of Greenwich Safeguarding Children Partnership website:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Operation Encompass – helps police and schools to work together to provide emotional and practical help when children have experienced a domestic incident. The DSL will be notified of a domestic incident before the child arrives at school the following day and can therefore arrange appropriate support.

### **Children missing from Education (and those with regular unauthorised absence)<sup>16</sup>**

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<sup>15</sup> [Mandatory duty to report FGM](#)

<sup>16</sup> [CME statutory guidance](#) and [Working together to improve school attendance](#)

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child with unexplainable and/or persistent absence patterns, regular unauthorised absence or a child going missing from education is a potential indicator of abuse or neglect, which may include sexual abuse or exploitation and child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour-based abuse or risk of forced marriage. Staff should be aware of their school's unauthorised absence and children missing from education procedures.

The school must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

### **Private fostering**

Private fostering is when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not their parent, a person with parental responsibility for them or a relative in their own home.

If a member of Federation staff suspects a child may be being privately fostered without formal arrangement it is important to notify Multi Agency Safeguarding Hub (**MASH**) Tel 0208 921 3172.

### **Preventing Radicalisation**

#### **Extremist ideology, radicalisation and terrorism**

Children and young people can suffer harm when exposed to extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

**Extremism:** the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces<sup>17</sup>.

**Radicalisation:** the process of a person legitimising support for, or use of, terrorist violence<sup>18</sup>.

**Terrorism:** an 'action that endangers or causes serious violence to a person; causes serious damage to property or seriously interferes or disrupts an electronic system'. The use or threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility for which an extremist or terrorist group may appear to provide an answer. Similarly, radicalisation can occur through different methods, such as social media or the internet. Staff should use their own judgement in identifying children at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

**The Prevent duty** – Section 26 of the Counterterrorism and Security Act 2015 ("the CTSA 2015"), places a duty on schools to have due regard to the need to prevent people from becoming involved with or supporting terrorism". See foot note 19. This duty is known as

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<sup>17</sup> March 2024 New definition of extremism.

<sup>18</sup> New definition for Radicalisation.

the Prevent duty. Paragraphs 141-210 of the Revised Prevent duty guidance: for England and Wales<sup>19</sup> is specifically concerned with schools (but also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments. The Federation's designated safeguarding leads (and any deputies) should be aware of this revised guidance and the local procedures for making a Prevent referral.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff should be able to demonstrate both a general understanding of the risks affecting children and young people in the area and an understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation.
- The Prevent duty builds on existing local partnership arrangements and take into account the policies and procedures of the Local Safeguarding Children Partnership. Effective engagement with parents/the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures, unless they have specific reason to believe that to do so would put the child at risk.
- Schools need to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, schools should ensure that the DSL lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

**Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. If a Prevent referral is passed to a multi-agency Channel Panel, then a member of school staff will attend (if asked) to help with any assessment of susceptibility/vulnerability.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** <sup>20</sup>

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, or through violence/the threat of violence. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more susceptible to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, etc. Children can be exploited by adult males, females, individuals or groups or by other children (who themselves may be experiencing exploitation).

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<sup>19</sup> [Prevent Duty guidance for England and Wales latest update 2024](#)

<sup>20</sup> See Annex B [KCSIE 2025](#) for further information.

**CSE** is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet. CSE can be a one-off occurrence and may happen without the child's knowledge, e.g. by sharing videos or images on social media.

Any child who has been coerced into engaging in sexual activities is being abused or exploited. This includes 16- and 17-year-olds who can legally **consent** to have sex. Some children may not realise they are being exploited, for example if they believe they are in a genuine, romantic relationship.

**CCE** is when children are forced or manipulated into participating in criminal activity. This can range from the transportation of drugs, weapons or money through county lines (see below) or being forced to work in the manufacture of drugs, forced to shoplift, committing vehicle crime or threatening/committing serious violence to others. Children can become trapped in a cycle of criminal activity, as perpetrators can threaten their families with violence or entrap and coerce the child into debt. The experiences of boy victims may be very different to those of girl victims.

Note: children criminally exploited may be at greater risk of sexual exploitation.

**Possible indicators of CSE and CCE**

- Having unaffordable/unexplained gifts or new possessions
- Going missing from home or care or coming home late
- Associating with other young people involved in exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Changes in emotional well-being
- Drug or alcohol misuse
- Unexplained injuries

### **Further indicators of CSE include**

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections, inappropriate sexual or sexualised behaviour or pregnancy

**County lines** is where gangs and organised criminal networks transport illegal drugs, both locally and across the UK. Children and susceptible adults are exploited to move, store and sell drugs and transport money, sometimes from urban areas to suburban and rural areas, market/seaside towns. Offenders will often use coercion, intimidation and serious violence (including sexual violence and weapons) to ensure compliance of victims. There may also be a threat of violence to the victim and their families can be used to trap the victim in continued criminality.

### **Possible indicators of County line involvement (in addition to some of the indicator mentioned for CSE and CCE) include<sup>21</sup>:**

- Victim is missing from home and subsequently found in area away from home or in accommodation to which they have no connection
- As a victim or perpetrator of serious violence (e.g. knife crime)
- In possession of more than one phone and receiving multiple calls requesting movement of drugs or money

### **Child-on-child/ child on child abuse<sup>22</sup>**

Children can abuse other children. This is generally referred to as child-on-child abuse, can take many forms and can happen both inside and outside of school and online. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

### **Child on Child abuse is most likely to include, but may not be limited to:**

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- 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)
- 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).
- **sexual violence** such as rape, assault by penetration; sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence); 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
- **sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. Sexual harassment is likely to violate a child's dignity, make them feel intimidated, degraded or humiliated.
  - deliberately brushing against or interfering with someone's clothes (this may cross into sexual violence)
  - displaying pictures, photos or drawings of a sexual nature
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - **upskirting**, which typically involves taking a picture under a person's clothing

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<sup>21</sup> Other indicators found in [KCSIE 2025](#) Annex B.

<sup>22</sup> Further information in [KCSIE 2025](#) Part 5.

without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

**Note:** Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This is referred to as "harmful sexual behaviour" (HSB) and can occur online and/or face-to-face and can also occur simultaneously.

The "Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour" section includes a new resource from the Lucy Faithfull Foundation. [Shore Space](#), developed in collaboration with the Home Office, is an online resource offering a confidential chat service to support young people concerned about their own or someone else's sexual thoughts and behaviour. This now sits alongside existing resources including the [HSB Toolkit](#) and the [Harmful sexual behaviour framework](#) from the NSPCC.

New links added to the "Additional Advice and Support" section. The guidance now includes [new resources from the Centre of Expertise on Child Sexual Abuse \(CSA Centre\)](#) to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours, and [Preventing Child Sexual Exploitation](#) from the Children's Society and Home office.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children **5-11-year-olds** and **12-17-year-olds**.

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

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

***Information regarding the definitions and signs of further safeguarding issues, including homelessness, modern slavery, cybercrime, children with family members in prison, etc. can be found in [KCSIE 2025 Annex B](#).***

## Appendix 2 Statutory Guidance, Legislation and Advice:

### Statutory Guidance, legislation and advice include:

- [The Children's Act 2004](#)
- [The Education Act 2002 \(section 175\)](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Keeping Children Safe in Education 2025](#)
- [Dealing with Allegations of Abuse Against Teachers and Other Staff](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Searching, screening and confiscation \(July 2022\)](#)
- [What to do if you're worried a child is being abused \(March 2015\) – advice for practitioners](#)
- [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\), updated 2024](#)
- [Domestic Abuse Act 2021, updated 2023](#)
- [Designated teacher for looked-after and previously looked-after children \(February 2018\)](#)
- [Greenwich Safeguarding Children Partnership](#)
- [Children Missing Education, September 2016, updated 2024](#)
- [Working together to improve school attendance, updated 2024](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education, April 2019, updated 2025](#)
- [NSPCC](#)
- [Harmful sexual behaviour framework](#)
- [Preventing Child Sexual Exploitation](#)
- [Centre of Expertise on Child Sexual Abuse \(CSA Centre\) to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours](#)
- [Shore Space](#) - developed in collaboration with the Home Office, is an online resource offering a confidential chat service to support young people concerned about their own or someone else's sexual thoughts and behaviour.
- [Harmful Sexual Behaviour Toolkit](#) Lucy Faithful Foundation
- [UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people \(2017\)](#)
- [The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [The Equality Act 2010](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- [Statutory guidance on the Prevent duty, updated 2024](#)
- [Meeting digital and technology standards in schools and colleges \(updated 2025\)](#)
- [Generative AI: product safety expectations \(KCSIE 2025 update\)](#)
- [Cyber security standards for schools and colleges](#)

### Other useful documents include:

- [Education Inspection Framework](#)
- [RBG Inter-Agency Referral Form](#)

## **Appendix 3: Child Protection Recording and Referral**

### **A. Record Keeping and Referral Guidance - The School MUST:**

- Keep clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken.
- Keep Child Protection information in separate files (these may be electronic) by the designated teacher and will only be discussed with staff on a need-to-know basis. Staff need to know when a child is at risk and what plan has been decided by case conference but may not need to know all the confidential details.
- Ensure all records, notes and observations made by class staff as part of ongoing monitoring of children on the child protection register or causing concern, are kept securely/scanned and uploaded to electronic system by the DSL. All documents must be dated and the person completing the form named.
- Ensure all child protection conference minutes are stored in the confidential files kept by the Designated Safeguarding Lead.

### **B. Recording Concerns**

Initial concerns, incidents or disclosure by a child must be reported to the DSL. Staff understand that some children may not feel confident in reporting concerns or may not have the language in which to do so. Staff need to create a safe space for the child to speak (this especially true for LGBT, EAL and SEND children who wish to share concerns).

A copy of a body map in Appendix 5 should be used to record injuries/marks/bruises.

#### **The following information must be recorded:**

- time, date, place and people who were present.
- exact details of what was said by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred

Details of injuries, marks or bruises - provide detail including number, length of marks, description of marks, colour of marks/bruises etc. Staff to record other relevant details - including information about previous incidents which may not have been reported but now seem relevant.

The DSL or staff as directed should continue to monitor for concerns and maintain a chronology of concern.

The record **must** contain information of how the concern/incident was followed up and the impact of any action.

### **C. Recording a disclosure – the adult should:**

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light
- Listen to what is being said without displaying shock or disbelief
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as "Tell me," and "How did that happen?"
- Do not ask leading questions but, if necessary, the member of staff can ask the question: 'have you been harmed' and 'how'?
- Not criticise the alleged perpetrator

- Reassure the child that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Explain what has to be done next and who has to be told
- Find out just enough to be sure of the need to refer
- Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the Federation's responsibility to 'check out' what any child tells, nor should any abuser be questioned.
- Sign and date the record of disclosure
- Speak with the Designated Safeguarding Lead for Child Protection, and provide them with the signed, dated written record, using the agreed school procedures, without delay.

#### **D. Referrals (see also flow chart)**

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff
- discussions with the child
- discussion with parents
- information provided to social services
- decisions taken (with times, dates and signed)

The designated teacher will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

#### **Reports for Child Protection Conferences/Core Group Meetings**

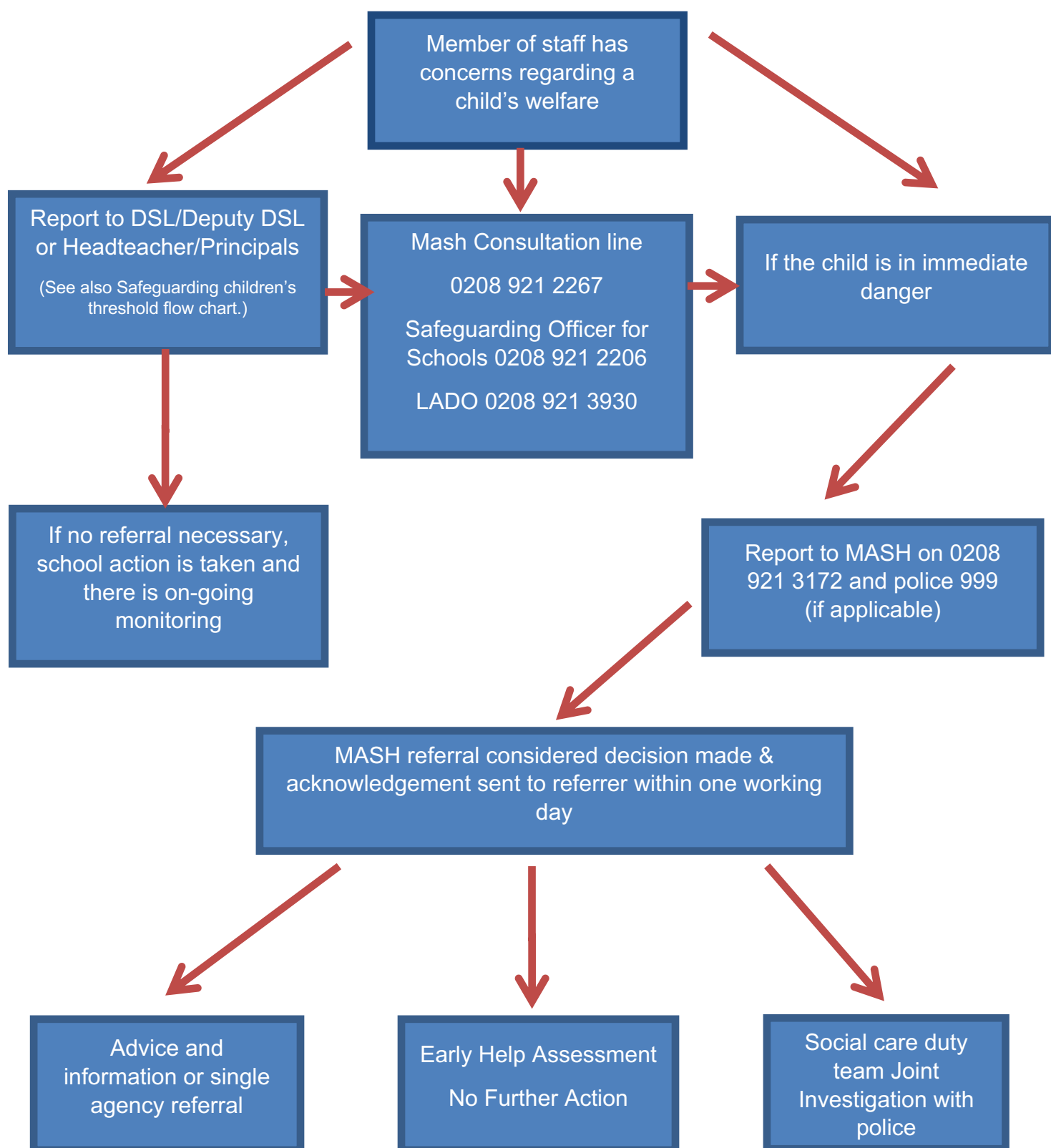
Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns.

They should provide clear, factual information. Staff should be aware that these reports will be made available to parents at the child protection conference.

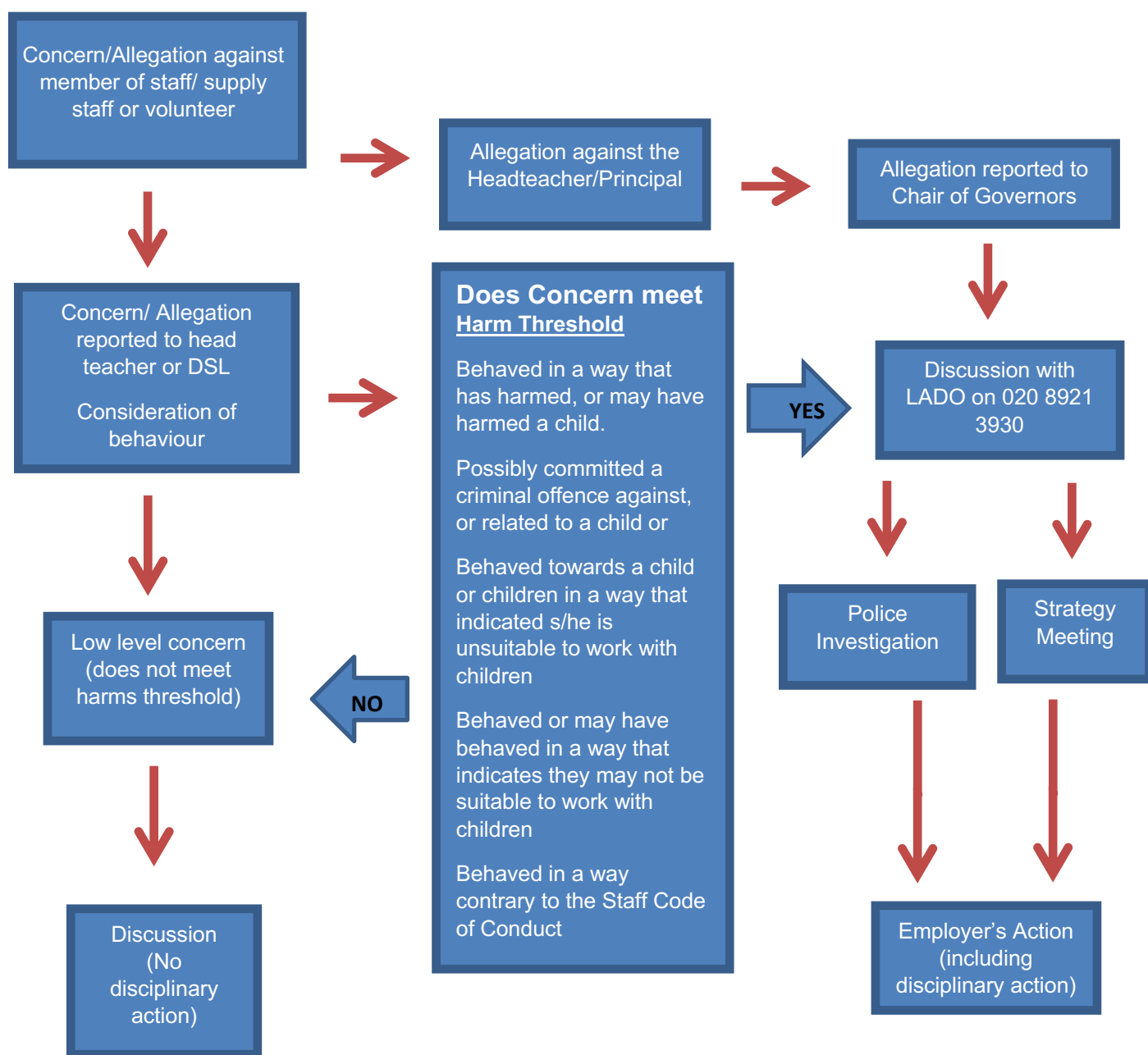
*If appropriate, the DSL should consider discussing the content of the report with the parent/carer in advance of any CP conference to help maintain a trusting and effective partnership.*

## Appendix 3 continued: Reporting concerns about a child

### Flow Chart for Reporting Concerns



## Appendix 4: Managing and Reporting Concerns or Allegations Against School Staff, Supply Staff, Volunteers and Contractors



Supply agency to be kept informed of any investigation concerning supply teacher

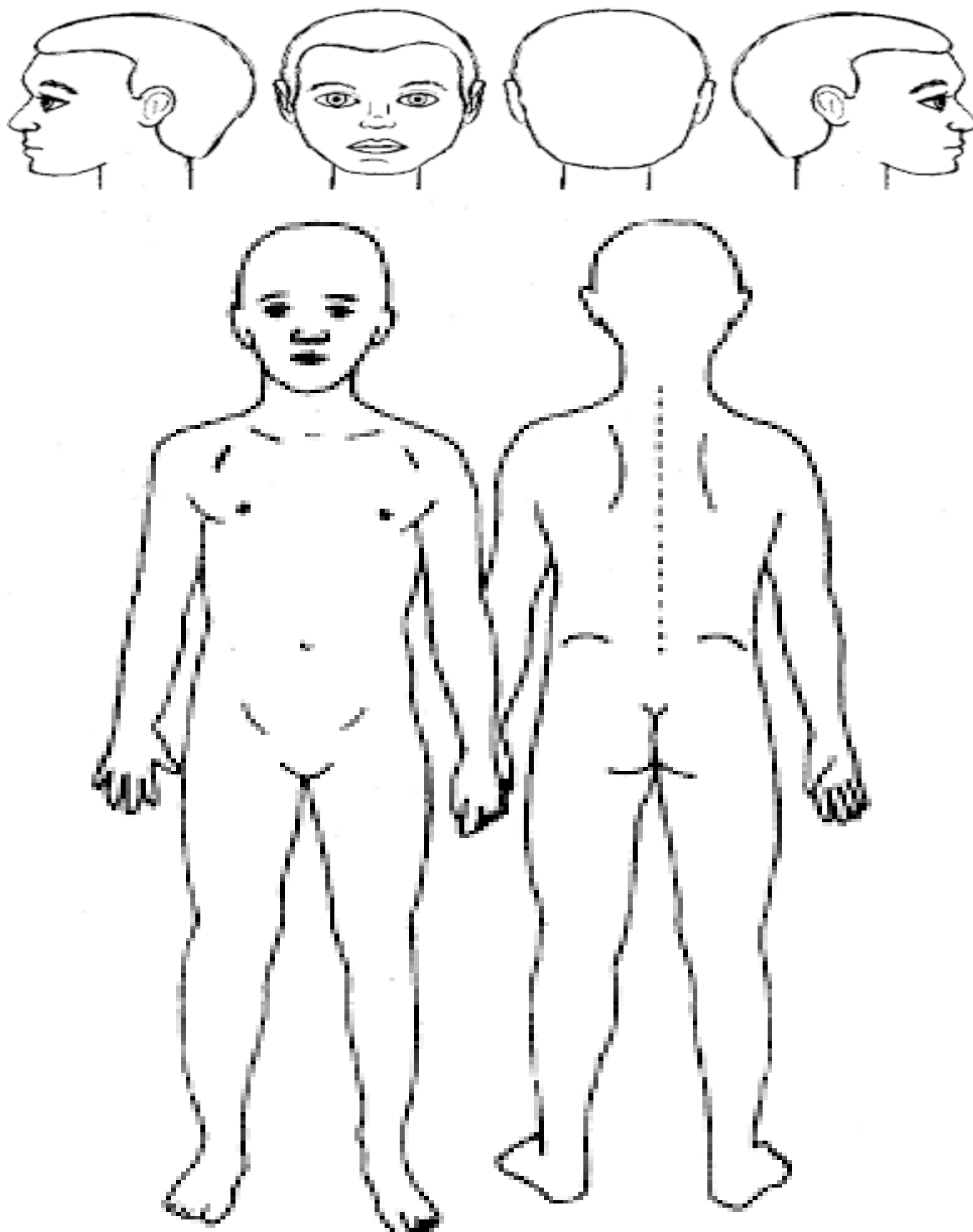


## Body Chart

Once completed attach this body chart to the Concern Form

This chart must be used together with the Concern Form Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Burn about 4cm.' On the Concern Form refer to the injury using the same number and description.

Child's Name -----

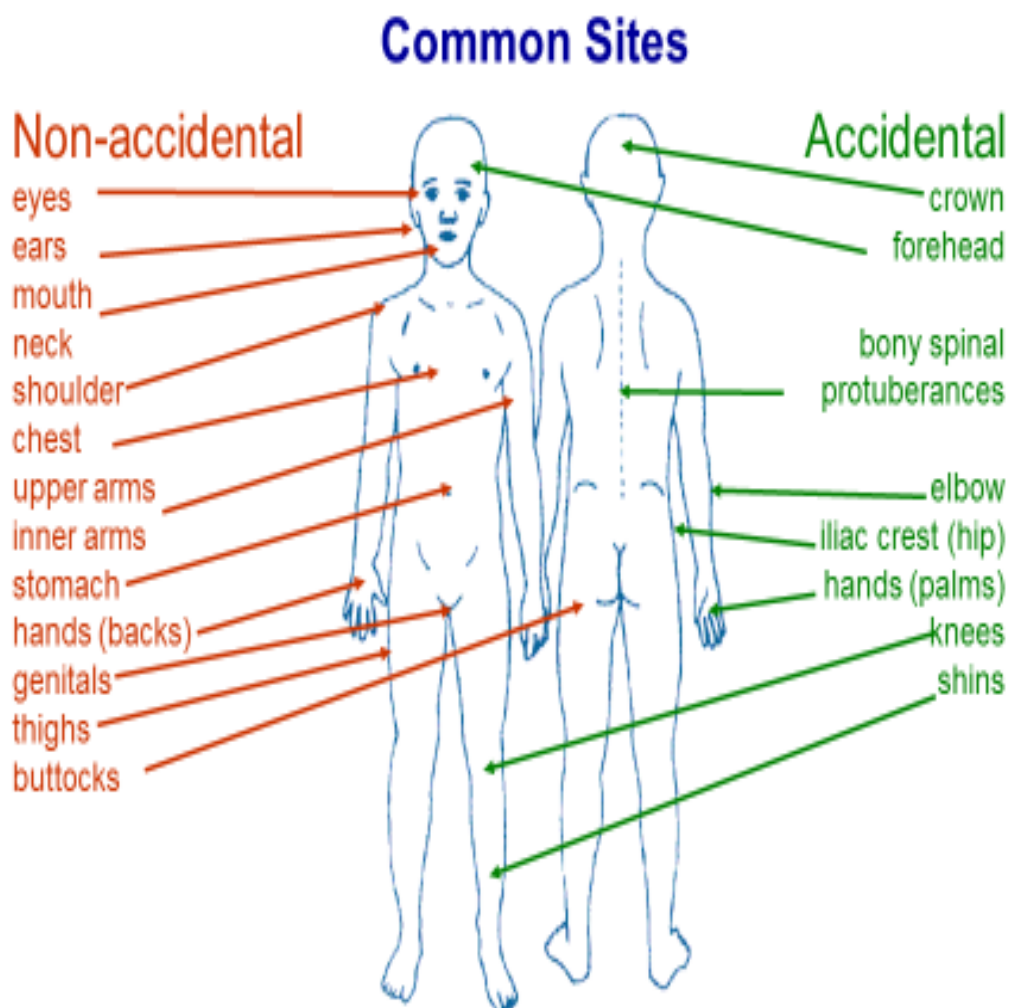


Observations made by----- Signed-----Date

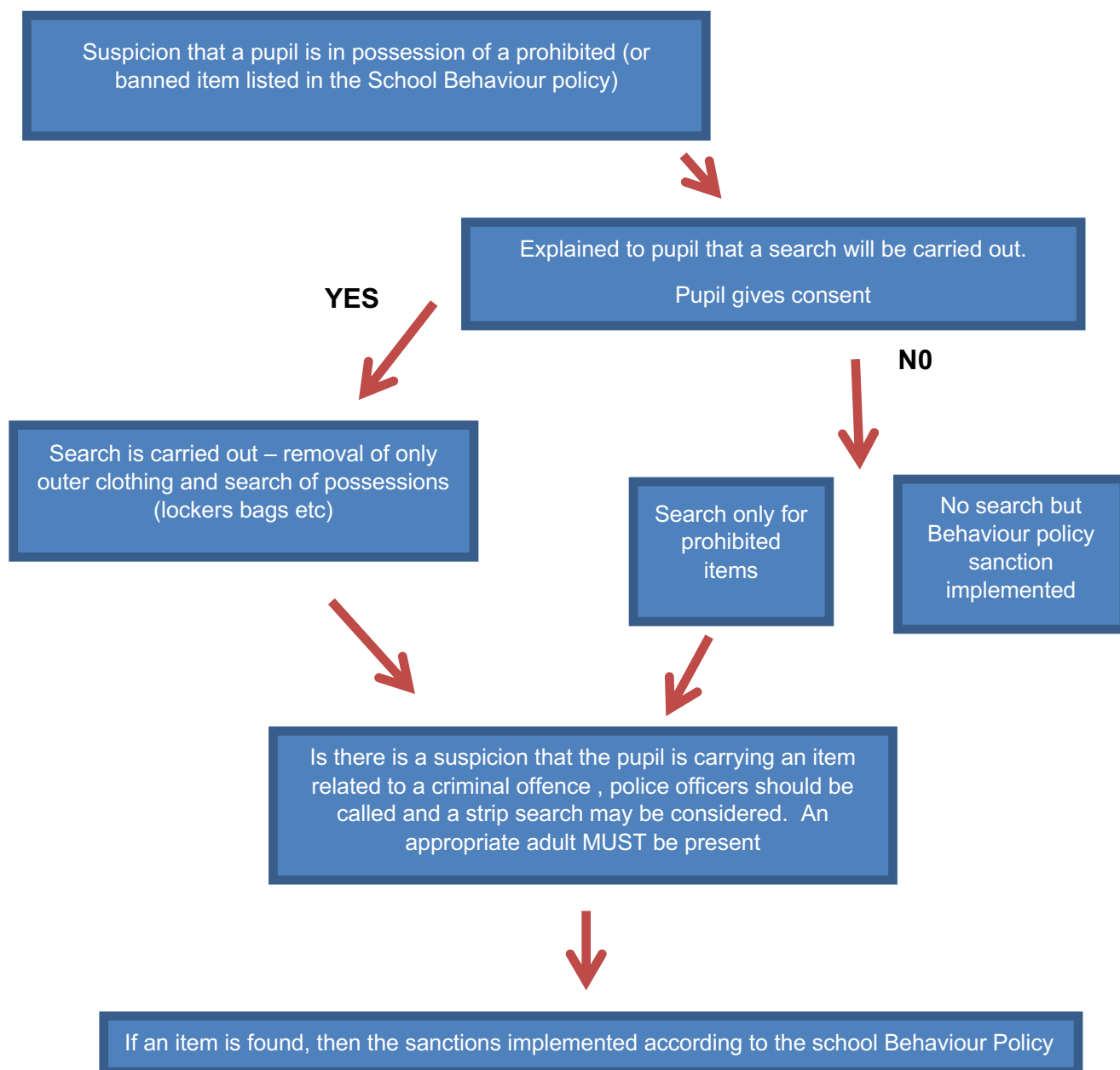
Signs and symptoms of physical injury can be indicators of abuse, however there may be other reasons they are not fail-safe mechanisms.

Red indicates a possible non-accidental injury.

Green is the more usual sites for accidental injuries.



## Appendix 6: Searching pupils for prohibited and banned items



### Note:

- All searches should be carried out with pupil's permission if possible and should be undertaken by a member of staff who has been authorised to do so by the headteacher.
- The person carrying out the search should be the same sex as the pupil and searches should be witnessed by a second adult member of staff.
- Searches will only require pupils to remove outer clothing (i.e., not worn wholly next to the skin or immediately over underwear).
- Strip searches can only be carried out by police officers. School staff should retain a duty of care/well-being for the pupil involved at all times.
- An appropriate adult must be present e.g., the parent/carer or a staff member (the school should facilitate the parent/carer as an appropriate adult if possible).
- Unless requested otherwise by the pupil, the appropriate adult should be the same sex as the pupil being searched.
- A record of all searches for prohibited items must be made by the DSL and the parents informed.

## Guidance:

If there is a suspicion that the pupil is carrying an item related to a criminal offence, call the police. Do not investigate further. Police Officers attending may consider a more thorough search using their powers under the Police and Criminal Evidence Act (PACE). In these circumstances an Appropriate Adult MUST be made available for the pupil and must be present during this procedure.

An Appropriate Adult would not be required if the police are attending the school to support a child (pupil) who has reported a crime or is the victim of a crime. For example, police officers from the Child Abuse Investigation Team (CAIT), or the reporting of a street robbery where the pupil has been the victim of this act.

See [KCSIE 2025](#) When to call the police. Guidance for Schools and Colleges.

## What is the aim of an appropriate adult?

The role of the appropriate adult is to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.

Here is how the law describes the role:

- "To safeguard the rights, entitlements and welfare of juveniles and vulnerable persons to whom the provisions of this and any other Code of Practice apply". *Police and Criminal Evidence Act 1984 Code C 1.7A*
- "To act as appropriate adults to safeguard the interests of children and young persons detained or questioned by police officers". *Crime and Disorder Act 1998 s.38(4)*

<https://www.appropriateadult.org.uk>

## Appendix 7: How the school meets the Digital Technology in Schools Standards

The Federation provides a safe environment to learn and work, and filtering and monitoring and filtering are key elements to safeguard staff and pupils from potentially harmful and inappropriate online material.

- KCSIE 2025 requires the DSL to have lead responsibility for understanding the filtering and monitoring systems and processes.
- The DfE published guidance for Meeting Digital and Technology standards<sup>23</sup> requires a member of SLT and governor to assume responsibility that the standards are met and that the roles and responsibilities for staff and third parties/external providers are assigned.

This Federation has the following assigned:

**SLT** - The procurement of the filtering and monitoring systems, decision making on restrictions/blocking/filtering, reviewing the effectiveness and overseeing reports are the responsibility of the SLT. They are also responsible for ensuring staff understand their role through staff training, adherence to policy and procedure and reporting concerns.

**DSL** – the DSL is responsible for receipt of filtering and monitoring reports, following up on safeguarding concerns and ensuring checks are undertaken by IT providers on the filtering and monitoring systems.

**IT service provider** - is responsible for maintaining, checking and reviewing the filtering and monitoring systems, providing filtering and monitoring reports to the DSL, implementing agreed actions following any concerns or checks to the system.

### In meeting this standard, the school has agreed to:

- Undertake an annual review (e.g. LGFL online safety risk assessment and audit or 360 safe website or similar) to identify risks and ensuring adherence to policy.
- Provide regular staff training for online safety.
- Ensure pupils are given the knowledge and skills to understand how to keep themselves safe online and learn about their digital footprint and the implications.
- To ensure online safety is promoted in school and is an embedded theme across all relevant curricular learning activities.
- Provide regular opportunities for communication with parents/carers to raise their awareness of online safety issues and deliver workshops or share information on relevant online safety topics and trends.
- Guidance on e-security is available from the [National Education Network](#) and [National Cyber Security Centre \(NCSC\)](#) to support schools to help them improve their resilience against cyber-attacks.

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<sup>23</sup> [Meeting Digital and Technology standards 2022 \(updated 2025\)](#)