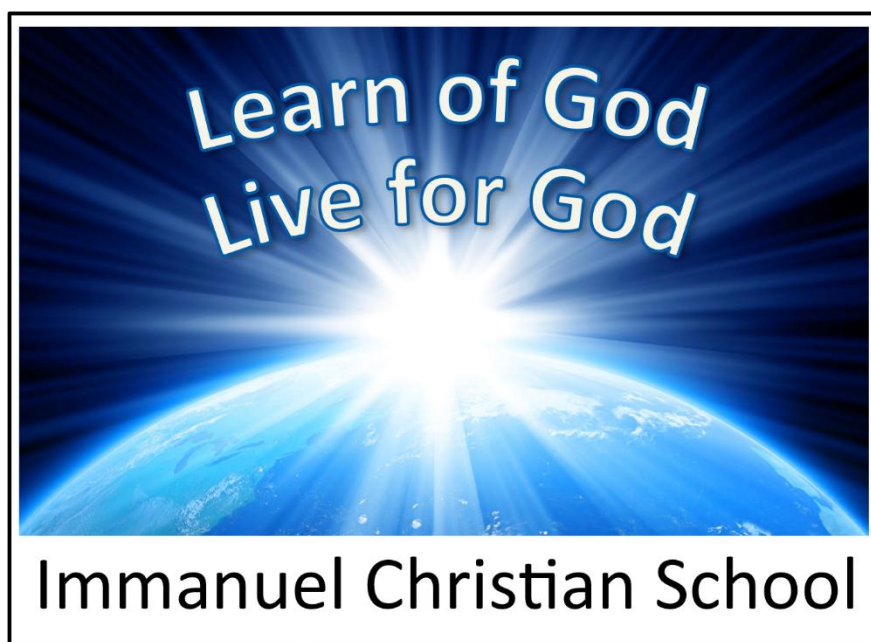




Immanuel Christian School
Safeguarding Policy

Immanuel Christian School
Safeguarding & Child Protection Policy

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SAFEGUARDING POLICY
Incorporating our Child Protection Policy

The Bible teaches that all children are precious in the sight of God. Jesus says, “let the little children come to me and do not hinder them, for the kingdom of God belongs to such as these.” Matthew 19vs14

However, we live in a fallen world and as such we have a responsibility to safeguard and promote the welfare of all the children in the school’s care. The school therefore has a responsibility to protect children from things that cause harm.

This policy is written in line with our:

- Staff Recruitment Policy
- E-Safety Policy
- Youth Produced Sexual Imagery Policy
- Whistleblowing Policy
- Anti-bullying Policy
- Child Missing from Education Policy
- Staff Code of Conduct
- Low Level Concerns Policy

These are all available on request from the school office.

SCHOOL STATEMENT

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

The terms ‘child’ and ‘children’ includes everyone under the age of 18.

The Governors take seriously their responsibility to protect and safeguard the welfare of children and young people entrusted to the school’s care. The Governors will ensure that persons with leadership and management responsibilities at the school demonstrate good skills and knowledge appropriate to their role and fulfil their responsibilities effectively so that the independent school standards are met consistently; and actively promote the well-being of pupils according to section 10(2) of the Children Act 2004.

Immanuel Christian School is a Safeguarding School. We will invoke Child Protection Procedures where necessary.

Our Designated Safeguarding Lead is Joanna Gulliford. Her role is to provide support and direction to staff members to carry out their safeguarding duties and to liaise closely with other services such as children’s social care, the Local Authority Designated Officer (LADO), the DBS and the police when managing referrals. As well as working closely with the principal.

Our Deputy Designated Safeguarding Lead is Andy Joy. His role is to provide support to the Lead and be available if the Lead is unavailable.

Our Safeguarding Governor is Fiona Barber. Her role in Safeguarding is to take leadership responsibility for the school’s safeguarding arrangements and to take the lead in dealing with allegations of abuse made against the Head Teacher.

All staff members (employees, contractors and volunteers) in the school must read the content of the policy. The *Teacher Standards 2012* states that teachers, including head teachers, should safeguard

children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff must undertake a regular course on safeguarding and child protection that must be updated regularly. The School is committed to an on-going training programme on such matters. Yearly updates will be undertaken at the beginning of each school year.

All staff must staff read Part 1 of Keeping Children Safe in Education (2025). The school has systems in place to assist staff understand and discharge their role and responsibilities".

The Governors recognise the need to build constructive links with childcare agencies, and will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

The Governors are committed to:

- Listening to, relating effectively and valuing children and young people whilst ensuring their protection within school activities.
- Ensuring safeguarding is taught 'as part of providing a broad and balanced curriculum'
- Encouraging and supporting parents/carers
- Ensuring that staff members are given support and training
- Having a system for dealing with concerns about possible abuse
- Maintaining good links with the statutory child care authorities

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

Everyone who encounters children and their families has a role to play in safeguarding children. Anyone working in the school is particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating; they form part of the wider safeguarding system for children. For a description of this system, see *Working Together to Safeguard Children, 2023*.

All staff members have a responsibility to provide a safe environment in which children can learn. They have a responsibility to identify children who may be in need of extra help or who are suffering, vulnerable, or are likely to suffer, significant harm. Staff have a responsibility to review and monitor the list of these students on a regular basis and all staff members then have a responsibility to take appropriate action, working with other services as needed, including **Early Help**.

Early Help is used to describe the process of taking action early and as soon as possible to tackle problems emerging for children, young people and their families. Effective help can occur at any point in a child or young person's life. Staff should be able to identify the vulnerable children in the school who need this level of support. These children should be identified and monitored. Staff need to understand the difference between a safeguarding concern and a child in immediate danger or at significant risk of harm, as part of identifying vulnerable learners. The DSL will lead when early help is appropriate.

The following indicators might highlight the potential need for early help:

- The child is disabled and has specific additional needs.
- The child has special educational needs (whether or not they have a statutory Education Health and Care Plan).
- The child has a mental health need
- The child is a young carer.

- The child is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- The child is frequently missing/goes missing from care or from home.
- The child is at risk of modern slavery, trafficking or exploitation.
- The child is showing early signs of abuse and/or neglect.
- The child is at risk of being radicalised or exploited.
- The child is in family circumstances presenting challenge for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- The child is misusing drugs or alcohol themselves.
- The child has returned home to their family from care.
- The child is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage.
- The child is a privately fostered child.
- The child is persistently absent from education, including persistent absences for part of the school day.

In addition to working with the Designated Safeguarding Lead, staff members should be aware that they might be asked to support social workers to take decisions about individual children.

All staff members should make themselves aware of the systems within the school that support safeguarding, which are explained in the staff induction. This includes the school's safeguarding and child protection policy; the staff code of conduct; and the designated safeguarding lead.

Staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to children's social care.

Staff members should be aware of any signs of extremist views of any kind in our school, whether from internal sources (students, staff or Governors) or external sources (school community, external agencies or individuals). Our pupils see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

Staff members are advised to 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.

A child going missing from an education setting is a potential indicator of abuse or neglect. Staff members should follow the school's procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation. More information can be found in this policy about children who run away or go missing from home or care.

If staff members have concerns about a child they should raise these with the school's Designated Safeguarding Lead, **immediately**. This also includes situations of abuse that may involve staff members. The safeguarding lead will usually decide whether to make a referral to children's social care, although any staff member can refer their concerns to children's social care directly. Where a child and family would benefit from co-ordinated support from more than one agency (for example education, health, housing, police) an inter-agency assessment will be conducted. These assessments, undertaken by a lead professional (a teacher, special educational needs co-ordinator, General Practitioner (GP), family support worker, and/or health visitor), will identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

A concern is when you are troubled about a child's welfare and you have reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. It involves the child's safety and well-being.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead (or Deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding.

Assessments of children should consider the wider environmental factors affecting the child's life that may pose a threat to their safety and/or welfare. As much contextual information as possible should be provided as part of the referral process. More information can be found at:

<https://contextualsafeguarding.org.uk/>

SAFER WORKING PRACTICES

The school has regard to the *Guidance for Safer Working Practices 2022* (<https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>) underpinning principles as follows:

- The welfare of the child is paramount
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff should work, and be seen to work, in an open and transparent way
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that **all** concerns should be reported and recorded
- Staff should discuss and/or take advice promptly from the headteacher if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action, and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or, for acts of serious misconduct, prohibition from teaching by the Teaching Regulation Agency (TRA)
- Staff and managers should continually monitor and review practice to ensure this guidance is followed
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and their local authority safeguarding procedures.

Staff should make themselves familiar with the following school documents and policies:

- Staff Handbook
- Low Level Concerns Policy
- Anti-Bullying Policy
- Staff Recruitment Policy
- Equality Policy
- Code of Conduct
- Grievance Procedure
- Staff Discipline Policy
- Whistleblowing Policy
- Data Protection Policy
- Fire Safety Policy
- First Aid Policy
- Health and Safety Policy
- Complaints Procedure
- Child Missing from Education Policy
- Off-site Visits Policy
- SEND Policy

Record Keeping

All concerns, discussions and decisions made pursuant to the terms of this Policy must be recorded in writing, stored securely and kept confidential. All records should include:

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

KEY TRAINING AREAS

Timescale for training

Induction Training for all staff and governors (mandatory)	At the commencement of employment at the school
Child Protection Awareness training for all staff and governors including Safeguarding (statutory)	Every year at the beginning of the school year
Designated Safeguarding Lead Training (statutory)	Every two years with refresher training every other year
Safer Recruitment Training (statutory)	Every two years
Training about preventing terrorism (statutory)	Annually

IMPORTANT CONTACT DETAILS:

Safeguarding incidents could happen anywhere, and staff should be alert to possible concerns being raised in this school

Safeguarding concerns about adults in the school should be made to the Designated Safeguarding Lead or to the Principal/Head Teacher.

Safeguarding concerns about independent school proprietors should go straight to the Local Authority Designated Officer - the LADO.

To contact the following staff members please call the school office in the first instance: 01454 311710

Joanna Gulliford – the Designated Safeguarding Lead Person for Child Protection

Kate Harding – the Designated Deputy Lead Person for Child Protection

Fiona Barber – The Governor responsible for safeguarding

All staff members may raise concerns directly with Children's Social Care services

The school will work with the Local Authority Designated Officer (LADO) as deemed appropriate. The LADO will provide advice and guidance to employers and voluntary organisations that have concerns about a person working or volunteering with children and young people who may have behaved inappropriately, or where they have received information that may constitute an allegation.

The LADO for South Gloucestershire is Tina Wilson. Her contact details are:

- Contact Name: Tina Wilson (Secretary – Angela King)
- Contact Number: 01454 868508
- Contact E-mail: tina.wilson@southglos.gov.uk (angela.king@southglos.gov.uk)
- Website: <http://sites.southglos.gov.uk/safeguarding/children/safeguarding-children-board/contact-the-board-2/>

The contact details for the Access Response Team are:

- Contact Number (Office Hours): 01454 866000
- Contact Number (Out of Hours): 01454 615165
- Website: www.southglos.gov.uk/health-and-social-care/care-and-support-children-families/access-response-team-art

E-mail: accessandresponse@southglos.gov.uk

For further advice or help contact:

- The NSPCC Helpline: 0800 800 5000
- The NSPCC whistle-blowing helpline: 0800 028 0285. help@nspcc.org.uk
<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>
- The Police: 101 to report crime and other concerns that do not require an emergency response; 999 when there is danger to life or when violence is being used or threatened.

Guidance from the National Police Chief's Council on what to expect when a call to the police is made can be found here:

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

TIMESCALES

An Initial Assessment should be initiated by the DSL or Deputy DSL within 24 hours of receipt of a referral and completed in a maximum of **10 working days**. However, this may depend on the case and the other agencies involved.

An initial assessment is deemed to be completed once the assessment has been discussed with the child and family (or caregivers) and the DSL or Deputy DSL has viewed and authorised the assessment.

The initial assessment period may be very brief if the criteria for initiating Local Authority involvement are met, i.e. it is suspected that the child is suffering, or is likely to suffer significant harm and a strategy discussion should take place.

Any extension to time-scale should be authorised by the DSL or Deputy DSL, with reasons recorded and any delay must be consistent with the welfare of the child.

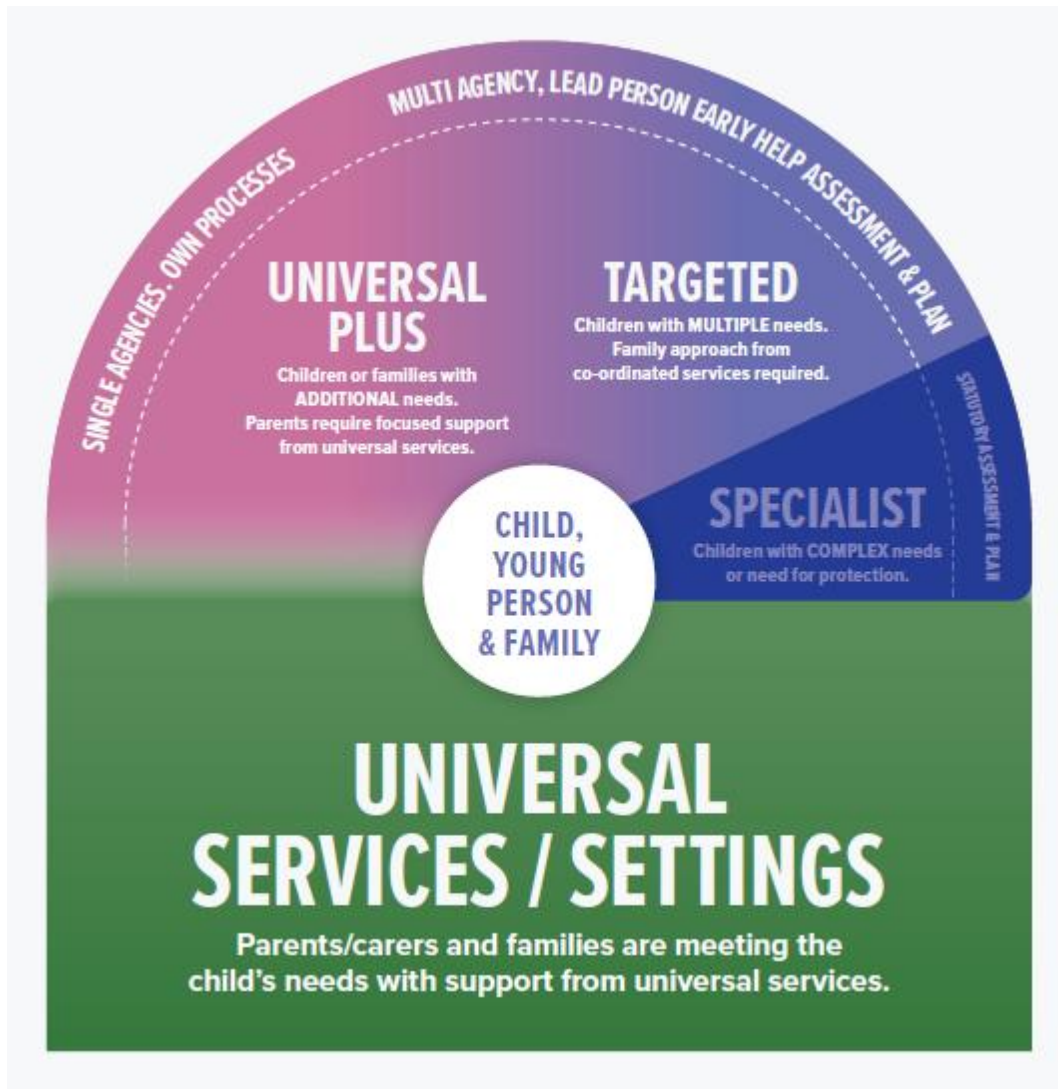
See Appendix 2 for Referral Flowchart

MULTI-AGENCY LEVELS OF NEED AND RESPONSE FRAMEWORK

South Gloucestershire's Early Help guide can be found here:

<http://sites.southglos.gov.uk/safeguarding/children/i-am-a-professional/threshold-tool-the-right-help/>

Their threshold of needs guidelines are split into the following assessments of needs:



The full details of how South Gloucestershire will operate this assessment system can be found in their January 2021 publication – The Right Help in the Right Way at the Right Time which can be accessed here: <http://sites.southglos.gov.uk/safeguarding/wp-content/uploads/sites/221/2016/08/The-Right-Help-in-the-Right-Way-at-the-Right-Time-January-2021.pdf>

CHILD PROTECTION POLICY

The Governors recognise that many children and young people today are the victims of neglect, and physical, sexual and emotional abuse, including extremism and radicalisation. Accordingly, the Governors have adopted the policy contained in this document, (hereafter “the policy”). The policy sets out agreed guidelines relating to the following areas:

- The Prevent Duty
- Definitions of abuse
- Responding to allegations of abuse, including those made against teachers in the school.
- Appointing teachers/assistants
- Supervision of activities and practice issues
- Helping victims of abuse
- Working with offenders
- Safer Recruitment including the level of DBS checks that will be undertaken for volunteers and Governors

THE PREVENT DUTY

From Wednesday 1 July 2015, all schools and childcare providers must have due regard to the need to prevent people being drawn into terrorism.

The Governmental definition of extremism is:

‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

Schools and EYFS providers have a critical part to play. In England, the Early Years Foundation Stage (EYFS) accordingly places clear duties on providers to keep children safe and promote their welfare. To protect children in our care, we must be alert to any safeguarding and child protection issues in the child’s life at home or elsewhere.

As a school and EYFS provider, we are expected to demonstrate activity in the following areas:

- Assessing the risk of children being drawn into terrorism.
- Demonstrate that we are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
- Ensure that our safeguarding arrangements consider the policies and procedures of the local authority, the police and the health service.
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- Ensuring children are safe from terrorist and extremist material when accessing the internet

The full Government Prevent Strategy can be viewed at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

The full Government Prevent Duty (2015) can be viewed at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

The Role of the Curriculum

We will work to ensure that our pupils will be skilled and equipped to be resilient and resist involvement in extreme or radical activities. Therefore, we recognise the need to build resilience in our pupils to make them less vulnerable.

We will therefore provide a broad and balanced curriculum within which we aim to support pupils, Spiritual, Moral, Social and Cultural development (SMSC). SMSC development is promoted through all our subjects, including the ethos of our school where development of positive attitudes and values is central to everything we do.

Values underpinning public life in the UK have been summarised as democracy, the rule of law, individual liberty, mutual respect, and the tolerance of those with different faiths and beliefs. It is important that our pupils understand this through different approaches using a balanced and broad curriculum. This supports our pupils to be responsible citizens and prepares for an adult life living and working in Britain which is diverse and changing.

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Citizenship programmes
- Open discussion and debate
- Work on anti-violence and a restorative approach addressed throughout curriculum
- Focussed educational programmes

We will also work with local partners, families and communities in our efforts to ensure our school understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our pupil's experiences and horizons. We will help support students who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a pupil is being directly affected by extremist materials or influences we will ensure that that pupil is offered mentoring.

SIGNIFICANT HARM

Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Decisions about significant harm should be informed by a careful assessment of the child's circumstances and discussion between statutory agencies and with the child and family.

INDICATORS OF ABUSE

The following definitions of child abuse are taken from the document '*Keeping Children Safe in Education*' (2025).

Abuse

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. 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. They may be abused by an adult or adults or another child or children.

Physical Abuse

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

Emotional Abuse

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

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 is a specific safeguarding issue in education (*see paragraph 30-33, KCSIE 2025*).

Neglect

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

SPECIFIC SAFEGUARDING ISSUES

Learners with SEN and Disabilities

Learners with SEN and disabilities have additional safeguarding vulnerabilities:

- Disabled children are at significantly greater risk of physical, sexual and emotional abuse and neglect than non-disabled children
- Disabled children at greatest risk of abuse are those with behaviour/conduct disorders. Other high-risk groups include children with learning difficulties/disabilities, children with speech and language difficulties, children with health-related conditions and deaf children.
- Disabled children are more likely to be abused by someone in their family compared to non-disabled children. The majority of disabled children are abused by someone who is known to them.
- Bullying is a feature in the lives of many disabled children
- Disabled children are more likely to experience the negative aspects of social networking sites than non-disabled children
- Disabled children (and severely disabled children even more so) may disclose less frequently and delay disclosure more often compared to typically developing children. Disabled children are most likely to turn to a trusted adult they know well for help such as family, friend or teacher

Disabled children are at greater risk of abuse and significant barriers can exist to their safeguarding and wellbeing. Understanding a child's needs, building on their strengths, overcoming the barriers and developing innovative solutions for meeting the challenges will not only enhance the child's wellbeing and protection from abuse but will provide learning that may also be of benefit for non-disabled children. Disabled children have an equal right to protection from abuse.

Mental Health

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

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

Children Missing from Education

A child going missing from education is a potential indicator of abuse or neglect. School staff should follow the school's procedures for dealing with children that go missing 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 their going missing in future.

The school has a ***Child Missing from Education*** policy, written in accordance with the *Children Missing Education Statutory Guidance for Local Authorities - September 2016*, which we will abide by concerning this area.

The school has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions.

In the case of a child being withdrawn from the school and their whereabouts being unknown, the school will endeavour in the first place to make contact with the parents or guardians.

If no communication is received within a week, the school will contact the LEA to enquire whether they have any information regarding the child. If the LEA do not have any facts about the whereabouts

of the child we will consult with the LEA about the next step which may involve handing the case over to the local Children's Services.

If this is the case, a note will be made in the Admissions Register stating that the child's whereabouts is unknown and that they have been referred to the LEA. This will be updated if any relevant information is received.

Serious Violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, having experienced maltreatment and having previously been involved in other criminal activity such as theft or robbery. This is more likely, but not exclusively, to affect boys. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal network gangs.

The government has published detailed advice for schools – Preventing Youth Violence and Gang Involvement – which will be adhered to in the event of a pupil being identified as at risk from or being involved in serious violent crime.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media.

CSE can affect any child including those who are sixteen or older and thus above the UK age of consent.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. This can be psychological, physical, sexual, financial or emotional. Children may be direct victims or experience the effects indirectly because they see or hear it.

Child Criminal Exploitation

Child Criminal Exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see paragraph below for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

The experiences of girls who are criminally exploited can be very different to that of boys and both are at risk. Those who are being criminally exploited may be at a higher risk of sexual exploitation as well.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims and their families if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be discussed with the DSL or Deputy DSL.

Child-on-Child Abuse

Child-on-child abuse:

- features physical, emotional, sexual and financial abuse of young people by their peers,
- can impact any young person, although the characteristics/experiences of some can be exploited by their peers, or missed by services, making them more vulnerable to abuse than others
- is influenced by the nature of the environments in which young people spend their time – home, school, peer group and community – and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc., can all be used to exert power over a peer.

- can affect any child/young person, sometimes vulnerable children are targeted. For example:
 - those living with domestic abuse or intra-familial abuse in their histories
 - young people in care
 - those who have experienced bereavement through the loss of a parent, sibling or friend
 - Black and minority ethnic children are under identified as victims but are over identified as perpetrators
 - Those with SEND
- hinges upon young people's experiences of power, and ultimately the notion of consent
- concepts of abuse are built upon notions of 'power' and therefore 'consent', not to be confused with the age of consent to sexual activity:
 - young people over the age of consent (16 and 17 year olds) can be abused by their peers
 - many young people who abuse their peers are themselves below the age of consent
- abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". All staff **must** challenge all such behaviour when they become aware of it.
- both girls and boys experience child-on-child abuse however they are likely to experience it differently, i.e. girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing type (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group) violence
- involves someone who abuses a 'vulnerability' or power imbalance to harm another and have the opportunity or be in an environment where this is possible.
- While perpetrators of child-on-child abuse pose a risk to others they are often victims of abuse themselves.

Forms of Child-on Child Abuse

This can include (but is not limited to)

- bullying (including cyberbullying);
- sexual violence;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- causing someone to engage in any sexual activity without consent;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing;
- sexting; and
- initiating/hazing type violence and rituals.

Actions the school will take

The school deals with a wide continuum of children's behaviour on a day to day basis and most cases will be dealt with via school-based processes. These are outlined in the following policies:

- Behaviour & Anti-Bullying Policy
- E-Safety Policy
- Attendance Policy

The school will also act to minimise the risk of child-on-child abuse by ensuring the establishment provides a safe environment, promotes positive standards of behaviour, has effective systems in place where children can raise concerns and provides safeguarding through the curriculum via PSHE and other curriculum opportunities. This may include targeted work with children identified as vulnerable or being at risk and developing risk assessment and targeted work with those identified as being a potential risk to others.

Action on serious concerns

The school recognises that children may abuse their peers physically, sexually and emotionally; this will not be tolerated or passed off as 'banter' or 'part of growing up'. The school will take this as seriously as abuse perpetrated by an adult and address it through the same processes as any safeguarding issue. We also recognise that children who abuse others are also likely to have considerable welfare and safeguarding issues themselves.

Child to child abuse may be a one-off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour/s as abusive however in some circumstances it may be less clear. In all cases the member of staff should discuss the concerns and seek advice from the Designated Safeguarding Lead (DSL).

When an allegation is made by a student against another student, members of staff should consider if the issues raised indicate that the child and/or alleged perpetrator may have emerging needs, complex/serious needs or child protection concerns.

Any suspicion or allegations that a child has been sexually abused or is likely to sexually abuse another child (or adult) should be referred immediately to the Local Authority Designated Officer (LADO) or the Police.

All allegations should be discussed with the Local Authority Designated Officer (LADO) on **the day** the allegation is made known to the school and advice sought from the LADO.

Particular considerations for cases where child on child abuse is a factor include:

- What is the nature, extent, and context of the behaviour including verbal, physical, sexting and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the duration and frequency? Were other children and/or adults involved?
- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this, i.e. coercion), and family and social circumstances?
- What are the relative chronological and developmental age of the two children and are there any differentials in power or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child themselves and others, i.e. other children in school, in the child's household, extended family, peer group, or wider social network?

Resources on child-on-child pressure can be found at:

<http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf>

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls and children with SEND are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual Violence

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape
- Assault by penetration
- Sexual Assault

Sexual Harassment

Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (the school will consider when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

Robust guidance on this matter may be found in Keeping Children Safe in Education 2025, and in the DfE guidance *Sexual Violence and Sexual Harassment between Children in Schools and Colleges*. This document covers:

- what sexual violence and harassment is
- schools’ and colleges’ legal responsibilities
- a whole school or college approach to safeguarding and child protection
- how to respond to reports of sexual violence and sexual harassment

Organised Abuse

Organised abuse is sexual abuse where there is more than a single abuser and the adults concerned appear to act in concert to abuse children and/or where an adult uses an institutional framework or position of authority to recruit children for sexual abuse.

Female Genital Mutilation

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

Teachers have a specific legal duty to act with regards to concerns about female genital mutilation (FGM) and must personally report to the police a disclosure that FGM has been carried out (in addition to liaising with the DSL. However, all staff should speak to the DSL where there are concerns.

The school will access the following documents if ever the need arises for such information, as referred to in pages 161-163 of KCSIE 2025:

- 'Multi-Agency Statutory Guidance on Female Genital Mutilation'
- 'FGM Mandatory Reporting Fact Sheet' and
- 'FGM - Mandatory Reporting of Female Genital Mutilation – procedural information',
- The South Gloucestershire Safeguarding Children Board's information on 'HBA, FGM and Forced Marriage Guidance' will also be taken into account:
<http://sites.southglos.gov.uk/safeguarding/wp-content/uploads/sites/221/2017/09/HBV-FGM-FM-Guidance-2017.pdf>

Radicalisation

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

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Honour-Based Abuse

So-called Honour Based Abuse (HBA) is a term used to describe abuse (violent and non-violent) committed within the context of the extended family which is motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim. Most victims of HBA are women or girls, although men may also be at risk.

Women and girls may lose honour through expressions of autonomy, particularly if this autonomy occurs within the area of sexuality. Men may be targeted either by the family of a woman who they are believed to have 'dishonoured', in which case both parties may be at risk, or by their own family if they are believed to be homosexual.

Some common triggers for HBA include:

- Refusing an arranged marriage
- Having a relationship outside the approved group
- Loss of virginity
- Pregnancy
- Spending time without the supervision of a family member
- Reporting domestic violence

'Honour-based abuse is intended to 'protect or defend family honour' by preventing and punishing a person's violations of family or community 'norms'. A child who is at risk of honour-based abuse is at significant risk of physical harm (including being murdered) and/or neglect and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.

An honour-based crime might be committed against someone who:

- becomes involved with a boyfriend or girlfriend from a different culture or religion;

- wants to get out of an arranged marriage;
- wants to get out of a forced marriage;
- wears clothes or takes part in activities that might not be considered traditional within a particular culture.

The perceived immoral behaviour which could precipitate a murder includes:

- inappropriate make-up or dress;
- the existence of a boyfriend;
- kissing or intimacy in a public place;
- pregnancy outside of marriage;
- being a victim of rape;
- inter-faith relationships.

Children sometimes truant from school to obtain relief from being policed at home by relatives. They can feel isolated from their family and social networks and become depressed, which can on some occasions lead to self-harm or suicide.

Families may feel shame long after the incident that brought about dishonour occurred, and therefore the risk of harm to a child can persist. This means that the young person's new boy/girlfriend, baby (if pregnancy caused the family to feel 'shame'), associates or siblings may be at risk of harm.

OTHER SAFEGUARDING ISSUES

Staff need to be aware of the following specific issues. Guidance and practical support on these specific safeguarding issues will be sought from expert and professional organisations, if and when needed, using the NSPCC and GOV.UK websites.

- Bullying including cyberbullying
- Domestic violence and abuse – *see the following sources for help identifying the signs of domestic abuse:*
 - NSPCC: UK domestic-abuse signs symptoms effects
 - Refuge: what is domestic violence/effects of domestic violence on children
 - SafeLives: young people and domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Homelessness
- Mental health
- Private fostering - staff and volunteers should remain alert to, and when it comes to their attention report to the LA, information which suggests a child is being privately fostered. They should then notify the LA to allow the LA to check the arrangements are safe.
- Sexting – See our ‘Youth-Produced Sexual Imagery Policy’
- Teenage relationship abuse
- Trafficking

Alternative Provision

- If the school places a pupil with an alternative provision provider, they remain responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. The provider should provide written confirmation that appropriate safeguarding checks have been carried out on those working at the establishment.

Adults Who Supervise Children on Work Experience

- When organising work placements, the school will ensure that the placement provider has policies and procedures in place to safeguard pupils.

Sharing Safeguarding/Child Protection Information with a New School or College

When a pupil with child protection issues moves school, the DSL should consider whether it is appropriate to share any information with the new school or college in advance of a pupil leaving, in addition to the child protection file. The DfE gives the example of information that would allow the new school or college to continue supporting a victim of abuse and have the appropriate support in place for the pupil's arrival.

RECOGNISING AND RESPONDING TO ABUSE

The following signs may or may not be indications that abuse has taken place, but the possibility should be considered. It is important to note that not all children will recognize their experiences as harmful and others may be very reticent to tell someone that they are being abused because they feel embarrassed, humiliated or are being threatened.

Physical Signs of Abuse

- Any injuries not consistent with the explanation given for them.
- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc.
- Injuries which have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care, etc
- Reluctance to change for, or participate in games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures etc which do not have an accidental explanation
- Cuts/ scratches/ substance abuse

Indicators of Possible Sexual Abuse

- Any allegations made by a child concerning sexual abuse
- Any allegations made by a child concerning female genital mutilation
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders – anorexia, bulimia

Emotional Signs of Abuse

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also, depression/ aggression, extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/ stealing/ lying

It is also important to note that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Although no-one in the school is appropriately trained to make a mental health diagnosis, staff and volunteers are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem.

The government has provided further guidance to assist all staff. It can be accessed here -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf

WHAT TO DO IF YOU SUSPECT THAT ABUSE MAY HAVE OCCURRED

- 1 You must report concerns as soon as possible to Joanna Gulliford, the Designated Safeguarding Officer (DSL), who is nominated by the Governors to act on their behalf in referring allegations or suspicions of neglect or abuse to the statutory authorities. She may also be required by conditions of the School Insurance Policy to immediately inform the Insurance Company. In the absence of the DSL, the matter should be brought to the attention of Kate Harding (hereafter the "Deputy DSL"). In all instances telephone 01454 311710.

If the suspicions in any way involve the DSL or Deputy DSL, then the report should be made to the Safeguarding Governor who should contact the Local Authority Designated Officer (LADO).

- 2 Staff should only involve those who need to be involved when a child tells them he/she is being abused or neglected. Suspicions will not be discussed with anyone other than those nominated above
- 3 It is, of course, the right of any individual as a citizen to make direct referrals to the child protection agencies or seek advice from a reputable safeguarding agency, although we hope that members of the school will use this procedure. If, however, you feel that the DSL or Deputy DSL have not responded appropriately to your concerns, then you should contact the relevant organisation direct.

ALLEGATIONS OF PHYSICAL INJURY OR NEGLECT

If a child has a physical injury or symptom of neglect, the DSL will:

- Contact the Local Authority Designated Officer (LADO) for advice in cases of deliberate injury or where concerned about the child's safety. The school in these circumstances should not inform the parents.
- Where emergency medical attention is necessary it will be sought immediately. The DSL will inform the doctor of any suspicions of abuse.
- In other circumstances speak with the parent/carers and suggest that medical help/attention be sought for the child. The doctor (or health visitor) will then initiate further action, if necessary.
- If appropriate, the parent/carers will be encouraged to seek help from the Local Authority.
- Where the parent/carers is unwilling to seek help, if appropriate, the DSL will offer to go with them. If they still fail to act, the DSL should, in cases of real concern, contact the local Safeguarding Board for advice.

ALLEGATIONS OF SEXUAL ABUSE

In the event of allegations or suspicions of sexual abuse, the DSL will:

- Contact the Police Child Protection Team directly. The DSL will NOT speak to the parent (or anyone else).
- If, for any reason, the DSL is unsure whether or not to follow the above, then advice from the Local Authority Designated Officer (LADO) will be sought and followed.
- Under no circumstances will the DSL attempt to carry out any investigation into the allegation or suspicions of sexual abuse. The role of the DSL is to collect and clarify the precise details of the allegation or suspicion and to provide this information to the LADO, whose task it is to investigate the matter under Section 47 of the Children Act 1989.
- Whilst allegations or suspicions of sexual abuse will normally be reported to the DSL, the absence of the DSL or Deputy DSL should not delay referral to the LADO.
- Exceptionally, should there be any disagreement between the person in receipt of the allegation or suspicion and the DSL or Deputy DSL as to the appropriateness of a referral to the LADO, that person retains a responsibility as a member of the public to report serious matters to the LADO, and should do so without hesitation.

- The Governors will support the DSL or Deputy DSL in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.

HOW TO RESPOND TO A CHILD WANTING TO TALK ABOUT ABUSE

It is not easy to give precise guidance, but the following may help:

General Points

- Show acceptance of what the child says (however unlikely the story may sound)
- Keep calm
- Look at the child directly
- Be honest
- Tell the child you will need to let someone else know – don't promise confidentiality
- Even when a child has broken a rule, they are not to blame for the abuse
- Be aware that the child may have been threatened or bribed not to tell
- Never push for information. If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen
- A victim should never be given the impression that they are creating a problem by reporting abuse. Nor should they ever be made to feel ashamed for making a report.

Helpful things you may say or show

- "You have done the right thing in telling me"
- Show acceptance of what the child says
- "Thank you for telling me"
- "It's not your fault"
- "I will help you"

Do not say

- "Why didn't you tell anyone before"
- "I can't believe it!"
- "Are you sure this is true?"
- "Why? How? When? Who? Where?"
- Never make false promises
- Never make statements such as "I am shocked, don't tell anyone else"

Concluding

- Again, reassure the child what you are going to do next and that you will let them know what happens (you might have to consider referring to the Children, Schools and Families department or the Police to prevent a child or young person returning home if you consider them to be seriously at risk of further abuse)
- Contact the person in the school responsible for coordinating child protection concerns or contact the Children, Schools and Families department/Police/NSPCC
- Consider your own feelings and seek pastoral support if needed

WHAT TO DO ONCE A CHILD HAS TALKED TO YOU ABOUT ABUSE

The Procedure

- Make notes as soon as possible (preferably within one hour of the child talking to you), writing down exactly what the child said and when she/he said it, what you said in reply and what was happening immediately beforehand (e.g. a description of the activity). Record dates and times of these events and when you made the record. Keep all hand-written notes, even if subsequently typed. Such records should be kept safely for an indefinite period.
- Report your discussion as soon as possible to the DSL. If the latter is implicated report to the Deputy DSL. If all are implicated, report to the Safeguarding Governor, who should contact the Local Authority Designated Officer (LADO).

- You should not discuss your suspicions or allegations with anyone other than those nominated in the above point.
- Once a child has talked about abuse the DSL should consider whether or not it is safe for a child to return home to a potentially abusive situation. On rare occasions, it might be necessary to take immediate action to contact the LADO and/ or Police to discuss putting into effect safety measures for the child so that they do not return home.

WORKING WITH OFFENDERS

The Governors in their commitment to the protection of all children will meet with the individual and discuss boundaries that the person will be expected to keep.

Offenders will be expected to sign a contract stipulating boundaries and will involve the person's family and partner who will need to be informed.

HELPING VICTIMS OF ABUSE

As a Christian school, we are committed to supporting victims of abuse.

The school will ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Staff members should not promise confidentiality to the child and always act in the interests of the child.

OFF-SITE VISITS

Appropriate risk assessments must be in place prior to any off-site visit taking place.

Any overnight visit will explicitly set out sleeping arrangements; the role and responsibility of each adult, whether employed or volunteers; on/off duty arrangements; clear expectations about boundaries and interactions with children/young people; and expectations around smoking/drinking by adult.

Safeguarding concerns or allegations will be responded to following the school safe-guarding procedures. The member of staff in charge of the visit will report any safeguarding concerns to the Designated Safeguarding Lead who will pass to the Local Authority Designated Officer (LADO) if appropriate. In an emergency, the staff member in charge will contact the police and/or social care.

POLICY ON SUSPICIONS OR ALLEGATIONS OF CHILD ABUSE INVOLVING SCHOOL STAFF

Staff, including supply staff and volunteers, must be aware that they may be vulnerable to accusations of abuse and must, therefore, be sensitive to a child's reaction to physical contact and react appropriately. During their daily contact with the children, all staff must be aware of the following:

- It is the policy of the school not to kiss the pupils.
- Staff should not touch a child in such a way or on parts of the body that might be considered indecent.
- Staff should avoid restraining children except when it is unavoidable.
- Staff should maintain professional standards of behaviour and appropriate boundaries at all times in relationships between themselves and the pupils, themselves and the parents.
- A member of staff, who feels that they may be at risk of being accused of behaving inappropriately, should request the presence of another member of staff.
- No form of corporal punishment should ever be used, nor its use ever threatened.
- When it is necessary to restrain a child to prevent injury to themselves, others or property, only the minimum force should be used and injury to the child concerned should be avoided.

If there is an allegation or suspicion of misconduct about a member of staff, the Head Teacher must be informed immediately. Failure to do so may result in disciplinary action.

If the allegation or suspicion in any way involves the DSL or Deputy DSL, then the report should be made to the Safeguarding Governor, who should contact the Local Authority Designated Officer (LADO) and give as much information as you can.

The school is required to inform the Disclosure and Barring Service as soon as investigations are completed, of any person, whether employed, contracted, a volunteer, or a student, whose services are no longer used because he or she is considered unsuitable to work with children.

The address for referrals is DBS customer services, PO Box 3961, Royal Wootton Bassett SN4 4HF - Telephone 03000 200 190. Failure by the school to make such a report could constitute an offence, leading to the school being removed from the DfE's register of Independent Schools (legislation from The Education (Provision of Information by Independent Schools) (England) Regulations 2003. Compromise Agreements cannot apply in this connection.

The school will also make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult. (See <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-the-harm-test>).

The Teaching Regulation Agency (TRA) will also be informed if staff are sacked due to safeguarding issues. <https://teacherservices.education.gov.uk/>

Regard must be given to the section 'Allegations of Abuse Made Against Teachers and Other Staff Including Supply Teachers and Volunteers', in the document "Keeping Children Safe in Education' (2025)". This should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she **may** pose a risk of harm to children."

Other (non-child abuse) allegations against staff (including supply staff and volunteers)

Where allegations are made against a member of staff which do not relate to child abuse, but which nonetheless indicate that the member of staff may not be suitable to work with children the provisions of Part IV KCSIE 2025 should be followed by the school.

ALLEGATIONS AGAINST PUPILS

The School's policies on bullying, discipline and sanctions should be read in conjunction with this policy and will also apply to this situation. Bullying should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation if it is considered to be in the interests of a child who might otherwise be at risk, in the interests of the pupils at large or to allow the investigation to proceed more effectively.

POLICY FOR CHILDREN LOOKED AFTER

The school recognises that children looked after/children in care are one of the most vulnerable groups of children so need more frequent observational assessment to meet their needs. All staff will be made aware of anyone in the school who is looked after so that the child can be supported adequately. On admission, it will be established who has parental responsibility so that statutory requirements are met.

The Governing body will ensure that staff have the skills, knowledge and understanding to keep looked after children or previously looked after children safe. Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her will be available for all staff involved, including the designated safeguarding lead having details of the child's social worker.

When dealing with looked after children and previously looked after children, the school will work together with all agencies involved and take prompt action when necessary to safeguard these children, who are a particularly vulnerable group.

CARE LEAVERS

*A **care leaver** is defined as a person aged 25 or under, who has been looked after by a local authority for at least 13 weeks since the age of 14; and who was looked after by the local authority at school-leaving age or after that date.*

If the need arises, the Designated Safeguarding Lead will liaise as necessary with the local authority Personal Advisor appointed to guide and support the care leaver, regarding any issues of concern affecting the care leaver.

PHOTOGRAPHY AND IMAGES

As stipulated in the Staff Code of Conduct, staff should not use their mobile phones or personal cameras to take pictures of any pupil. Photography for use on the school website or for displays etc must be

taken on the school camera or by a specific individual appointed by the school for that purpose. No publicity material for the school (hard or soft copy) is to be produced without the express consent and copy sign-off of the Headteacher.

EXTERNAL VISITORS/CONTRIBUTORS/SPEAKERS

Visitors with a professional role, such as the school nurse, social worker, educational psychologist or members of the Police will have had the appropriate vetting checks undertaken by their own organisation. Any professionals visiting the school should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the school will contact the relevant organisation to verify the individual's identity.

SAFER RECRUITMENT

The school will follow the procedures as laid out in the school's Staff Recruitment Policy. A brief summary follows.

Before employing a teacher, the school will take all reasonable steps to establish whether the individual is subject to a teacher prohibition order and, if so, prevent their employment. The school will verify a candidate's identity, preferably from current photographic ID and proof of address.

Enhanced DBS checks will be undertaken for all staff, including volunteers who are carrying out relevant, unsupervised activities with the students, and all Governors. When responding to questions from the school about their criminal record, staff do not need to provide details about any protected cautions or protected convictions.

Those in regulated activity will need an enhanced DBS certificate with barred list check. A **supervised** volunteer who regularly teaches or looks after children **is not in regulated activity**.

A separate barred list check (List 99 check) will be obtained if an individual will start work in regulated activity before the DBS certificate is available

A Prohibition from Teaching Check will be completed for *everyone* engaged in 'teaching work', whether a qualified teacher or not; and recorded on the Single Central Record, to ensure they are not prohibited from teaching, using **Teacher Services** (<https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>).

Even people with QTS, must have this prohibition check entered into the Single Central Record. The Teacher Service's system will be used to verify any award of QTS and the completion of an induction/probation.

All leaders and managers, including Governors are required to have a **section 128 Management Check** – This will be included on the school's SCR showing that checks have been according to section 128. This will also be done using Teacher Services.

In the case of a foreign national, the appropriate overseas body from their country will be contacted for a criminal record check or police clearance.

Ideally, all foreign nationals should obtain a criminal record check or police clearance before applying for a position with the school.

The applicant's right to work in the UK will be checked and evidence kept on record.

As part of our Safeguarding Policy employment will not be offered without the applicant supplying evidence of a full employment history, including information on any gaps

Two references will be requested, for all staff, including volunteers. Where possible, references will be obtained prior to interviews to allow any concerns to be explored with the referee and discussed with the candidate.

The criteria for NOT appointing children's workers are:

- Previous offences against children
- If the Governors have reservations about an individual's behaviour, lifestyle, attitudes and spiritual commitment.
- If the Governors have any reasons to doubt a worker's suitability for the job.

All new staff will be expected to read the school Code of Conduct and all policies concerning Child Protection and Safeguarding as part of their Induction Process, including the Anti-Bullying Policy, the safeguarding response to children who go missing from education, and the identity of the DSL and Deputy DSL.

The school will keep this information on all staff members as to whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed, in a single central record.

If an applicant's criminal record check reveals details of past cautions and/or convictions the following procedures will be followed:

- If the certificate simply confirms what the applicant has already disclosed, and the school has already taken this information into account when making the offer of employment, the school will confirm the offer of employment.
- If the decision to recruit an applicant depends upon approval from a senior staff member, the school shall ensure that the decision maker has all the relevant information to hand in order to make a fair and balanced decision. This may include the applicant's initial disclosure, a disclosure statement and any other relevant information they may have provided in the interim that may inform a risk assessment.
- If the certificate reveals information that the school was not expecting or that the applicant had not previously disclosed, further consideration will be necessary, with the presumption that the appointment will not be made.

At least one person conducting an interview will have completed safer recruitment training.

Disqualification

Under section 76(3) schools are prohibited from employing a disqualified person in connection with relevant childcare provision in the settings set out in the relevant offences and orders section of the *Disqualification under the Childcare Act 2006*, unless the individual in question has been granted a waiver by Ofsted for the role they wish to undertake. An employer commits an offence if they contravene section 76(3), except if they prove that they did not know, and had no reasonable grounds for believing, that the person they employed was disqualified.

Disqualification by Association

Disqualification by Association applies if a person is living in the same household where another person who is disqualified lives or is employed (disqualification 'by association') as specified in regulation 9 of the 2018 regulations. Under the 2018 regulations, schools are no longer required to establish whether a member of staff providing, or employed to work in childcare, is disqualified by association.

ROLE AND RESPONSIBILITIES OF THE SCHOOL DESIGNATED SAFEGUARDING LEAD

The School Designated Safeguarding Lead (DSL) is the first point of contact for any member of the school staff who has a concern about the safety and well-being of a student. The DSL and Deputy DSL are most likely to have a complete safeguarding picture and will be the most appropriate individuals to advise on any safeguarding concerns.

The DSL does not need to be a member of the teaching staff but should be a recognised member of the Senior Management Team with the required status and authority to carry out the requirements of the role. Their appointment will be decided by the governing board.

The Deputy DSL is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a student's needs.

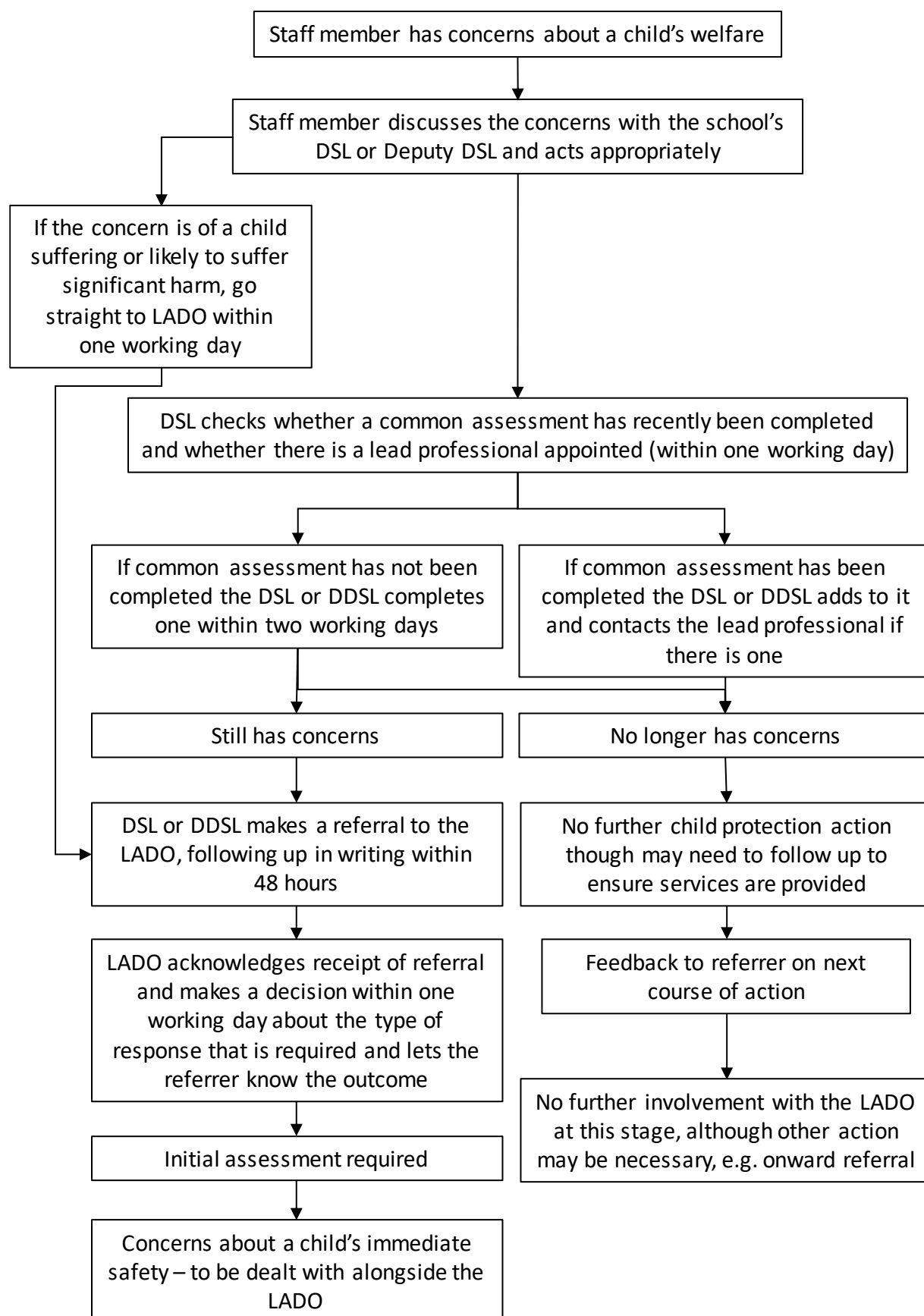
The DSL and Deputy DSL are required to undertake child protection training every two years and should supplement this training by attending workshops where available, at least annually. This training should also help the DSL and Deputy DSL recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

Requirements:

- To have the skills and ability to identify signs of abuse.
- To know how to refer concerns to the appropriate investigating agencies.
- Maintain detailed and accurate written records of child protection concerns and ensure they are kept securely.
- Keep a safe record of all information provided by the Local Authority where a particular child has a social worker; and use this information in the best interests of the child's safety, welfare and educational outcomes.
- Offer support, advice and give a level of expertise to all members of the school staff team.
- Ensure that all staff have access to and understand the school Safeguarding and Child Protection Policy and Procedures.
- To be able to provide basic awareness/child protection training as part of the induction for all new staff in the school and be part of any other relevant training.
- Be responsible for the annual review and update of the School Safeguarding Policy and the presentation of this to the Governing Body.
- Ensure that a copy of the School Safeguarding and Child Protection Policy is available for any parents who request to see it.
- Ensure that the Chair of Governors is updated on a regular basis about all issues and child protection investigations.
- Ensure that relevant safeguarding files are copied and forwarded appropriately when a child/young person transfers to another school.
- Be part of the team who review and monitor any causes of concern relating to students which are raised in school

Appendix 2

REFERRAL FLOWCHART



Immanuel Christian School
Safeguarding Policy – version 12
Adopted by the Governors on 19/11/2015.
Reviewed and adopted – 26/09/2016
Reviewed and adopted – 20/06/2017
Reviewed and adopted – 09/12/2017
Revised and adopted – 25/09/2018
Revised and adopted – 04/09/2019
Revised and adopted – 03/09/2020
Revised and adopted – 03/09/2021
Revised and adopted – 01/09/2022
Revised and adopted – 01/09/2023
Revised and adopted – 01/09/2024
Revised and adopted – 01/09/2025