

**St George's**  
School Edgbaston

# **SAFEGUARDING AND CHILD PROTECTION POLICY**

Revised: September 2026



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## 1. At a Glance

At St George's School Edgbaston, safeguarding is at the heart of everything we do. We believe that every child and young person deserves to learn, grow, and thrive in a safe, supportive, and nurturing environment. Our commitment to safeguarding reflects our core ethos, values and aims.

This safeguarding policy is underpinned by our four school aims and our commitments to UNICEF's Convention on the Rights of the Child. By living out these values, we actively promote the safety, dignity, and wellbeing of every member of our school community.

Safeguarding is everyone's responsibility. Through this policy, robust procedures, and a shared moral purpose, we work collaboratively to ensure that all children are protected from harm and empowered to speak up, be heard, and stay safe.

### Checklist

St George's School is committed to a comprehensive approach to safeguarding:

- ☐ We acknowledge that harm can occur in various domains, including our school, and will be proactive to address risk
- ☐ We strive to adopt a holistic approach to safeguarding which includes deliberately teaching our children how to be safe
- ☐ We will work in partnership with children, their families and partner agencies to a common goal of safety and best interests of the child
- ☐ We will be proactive in our support of children's emotional wellbeing and mental health
- ☐ We will ensure there are clear roles and responsibilities in relation to safeguarding children
- ☐ We will provide high-quality safeguarding training to all staff and ensure those with a safeguarding role get the specialist training they need
- ☐ We will fulfil the statutory obligations placed on us to keep children safe and promote their wellbeing

### In Brief

This safeguarding and child protection policy applies across all St George's School, covering Early Years to Sixth Form, and must be followed in all safeguarding situations.

The policy outlines how we aim to promote the safety and wellbeing of children in line with current laws and guidance and applies to all St George's staff, including volunteers, trainee teachers and contractors. The policy also acknowledges that harm is experienced differently by everyone so therefore is not prescriptive in processes but

instead insists on a specific approach and culture which is child-focussed and trauma-informed.

St George's School must also follow locals safeguarding procedures through their Multi-Agency Safeguarding Arrangements (MASA), ensure proper reporting systems, and keep staff informed and updated on relevant local safeguarding concerns.

### **Contextual Safeguarding**

We must ask, "what are we protecting our children from" and consult with the Local Authority, staff, and children for their views. This means that in our school, all staff will be made aware of specific issues relating to locality that could impact the safety of children at the school.

## **Contact Details**

**Headteacher (holding responsibility for safeguarding within School):** Mr L Nicholls

Contact email: [Headteacher@sgse.co.uk](mailto:Headteacher@sgse.co.uk)

Telephone: 0121 625 0398

**Designated Safeguarding Lead:** Mrs V Jones

Contact email: [DSL@sgse.co.uk](mailto:DSL@sgse.co.uk)

Telephone: 0121 625 0398

**Designated Looked After Children Lead:** Mrs A Taylor / Mrs A Boland / Mrs H Murphy

Contact email: [DSL@sgse.co.uk](mailto:DSL@sgse.co.uk)

Telephone: 0121 625 0398

**Senior Mental Health Lead:** Mrs V Jones

Contact email: [DSL@sgse.co.uk](mailto:DSL@sgse.co.uk)

Telephone: 0121 625 0398

**School Single Point of Contact for PREVENT:**

Contact email: [DSL@sgse.co.uk](mailto:DSL@sgse.co.uk)

Telephone: 0121 625 0398

**Safeguarding Trustee for the School:** Dr E Insch

Contact email: [InschE@sgse.co.uk](mailto:InschE@sgse.co.uk)

Telephone: 0121625 0398

If you are concerned about a child, you should either speak to the DSL, or you can contact the Local Authority for where the child lives. You can find local authority contact details [here](#).

In the event of a significant safeguarding event during periods of school closure or when escalation is required, please contact one of our DSL's: [DSL@sgse.co.uk](mailto:DSL@sgse.co.uk)

## **Equality Statement**

All pupils are entitled to a safe, inclusive, and respectful environment. No pupil will be singled out, ostracised, blamed, or held responsible by peers or adults for the actions of others. This applies particularly where such treatment is based on their own, or their family's or community's, religion, belief, or ethnic background. Any behaviour that targets individuals or groups in this way will be taken seriously and addressed promptly under our safeguarding and equality duties.

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

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

## **2. Child Safeguarding Practice**

### **Recognising Harm**

At St George's School, we recognise that safeguarding is everyone's responsibility, and that harm can manifest in a variety of ways. All staff play a crucial role in identifying early signs that a child may be at risk and in taking appropriate action to safeguard their wellbeing.

*Keeping Children Safe in Education* (2026) defines safeguarding and promoting the welfare of children as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether 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

Child protection, as defined in *Working Together to Safeguard Children* (2026), refers to the activity undertaken to protect individual children who are suffering, or are likely to suffer, significant harm. This includes timely assessment, intervention, and referral to statutory services where necessary.

All staff, including those who do not work directly with children, must read and understand Part One of *Keeping Children Safe in Education* (2026), which supports their ability to identify types of harm. Staff are also trained in trauma-informed and relational practice via the St George's School Way which further supports staff to recognise change in students which may indicate harm or enhances a student's ability disclose.

We understand that children and young people may face risks in a variety of social environments beyond the home, including at school, in peer groups, in the community, and online. Contextual safeguarding recognises that a child's experiences outside of the home can significantly influence their safety and wellbeing and that harm can occur in settings such as parks, shopping centres, social media platforms, or within peer relationships. Safeguarding concerns may also arise from patterns of behaviour, attendance, exclusion, or emotional wellbeing and must not be viewed in isolation from safeguarding.

All staff are expected to demonstrate professional curiosity, respectfully challenge information where needed, and escalate concerns if they feel they are not being acted upon appropriately, including via whistleblowing procedures.

As part of our safeguarding approach, St George's School considers the full context in which concerns arise. We work closely with external agencies, families, and local safeguarding partners to build a comprehensive picture of the child's lived experience and address risks both inside and outside of the school environment.

## **Responding to Harm**

All staff have a duty to respond promptly and appropriately to any concerns or disclosures of harm. We understand that a child may choose to disclose abuse directly, or staff may observe signs that give cause for concern. In all cases, the safety and wellbeing of the child is our top priority.

The key steps for responding to concerns or disclosures are:

### **Listen and Reassure**

- Remain calm and listen carefully without interrupting
- Take what the child says seriously and offer reassurance that they have done the right thing by telling you
- Do not promise confidentiality - explain that you must share the information to help keep them safe

### **Record and Report**

- Record the concern or disclosure as soon as possible on CPOMS, using the child's own words
- Include key details: time, date, what was said or observed, and any actions taken
- Report the concern immediately to the Designated Safeguarding Lead (DSL) or another member of the school safeguarding team
- Do not investigate
- Staff must not question the child further or attempt to investigate the concern themselves
- The role of staff is to listen, record, and refer. Further assessment or investigation will be led by the DSL and, where appropriate, children's social care or the police

### **Follow-Up and Support**

Our safeguarding teams are trained to respond to harm in the ways outlined in *Keeping Children Safe in Education (KCSIE)* and local Multi-Agency Safeguarding Arrangements (MASA). The DSL will lead on ensuring the child is safe and will determine the next steps, including making referrals and offering support. This might include referrals to statutory services such as police or social care or referrals to Family Help services. School safeguarding staff should use information from the Birmingham Children's Trust website to aid their decision making.

Our school may offer families targeted family help support and with their consent make referrals of local organisations who can help or to local St George's School

services available via our community hubs. There is also the option for school to refer to our therapeutic intervention for parents, St George's School Encounter.

Ongoing pastoral care and support will be provided as needed, with regular communication with relevant staff and parents / carers (where appropriate).

All concerns about harm, regardless of perceived severity, will be taken seriously and managed in accordance with statutory guidance, local MASA and the current evidence based best practice. School safeguarding teams can seek advice and support from the St George's School National Safeguarding Team when required.

### **Discussing Concerns with Parents**

We recognise the importance of working in partnership with parents and carers to safeguard and promote the welfare of children.

- Where appropriate, concerns about a child's safety or wellbeing will be discussed with their parents or carers. This will typically be undertaken by the DSL following a disclosure or where there is a suspicion of harm
- Other staff members must not engage in safeguarding discussions with parents or carers without first consulting with the DSL
- In situations where informing parents or carers may place a child at further risk, the DSL will seek advice from the local authority children's social care team before making contact
- Where there are allegations of abuse involving other children (child-on-child abuse), the school will usually inform the parents or carers of all children involved. Information sharing will be handled sensitively and in accordance with guidance from the police and / or children's social care, to ensure that the rights and privacy of all individuals are respected

### **Child Voice**

We are committed to creating a culture where children feel safe, listened to, and taken seriously. We actively seek to understand and consider students' wishes and feelings in all aspects of safeguarding and child protection.

Staff are trained to listen to children attentively and respectfully, recognising the importance of what they say - verbally or through behaviour. The DSL ensures that children's voices are considered when making decisions that affect their safety, wellbeing, and support, in line with statutory guidance.

Safeguarding teams are trained to gather child voice, wishes and feelings using a range of direct work tools. Where appropriate, these views of the child will be used to

inform referrals, plans, and interventions, while always maintaining a focus on their best interests and welfare.

### **Recognising and Responding to Technology-Assisted Harm**

We recognise that the online world presents both opportunities and risks for children and young people. Whilst it is anticipated that children's access to the on-line world and social media is set to change in 2026-2027, it is still anticipated that many will continue to access social media sites; therefore, it is important to continue to consider the risks faced. Technology-assisted harm can take many forms, including cyberbullying, grooming, exposure to inappropriate content, online exploitation, and misinformation or disinformation. Children may also be exposed to false, misleading, or manipulated content designed to influence beliefs, behaviours, or decision-making. We are committed to educating and protecting our pupils from these risks as part of our safeguarding responsibilities. Our school has procedures in place to ensure students do not have access to mobile phones in Prep and Senior School.

Types of technology-assisted harm may also include trolling, or online harassment, sharing of consensual and non-consensual sharing of self-generated intimate images (nudes and semi-nudes), including AI-generated content (e.g. deepfakes), online grooming or radicalisation, access to harmful content, including self-harm or extremist material or exploitation through gaming or social media platforms. Staff should be aware that online harm may be personalised or algorithm-driven, increasing risk of rapid escalation and normalisation of harmful content and that all images created, consensual or not require a safeguarding response.

As Artificial Intelligence (AI) technologies become more integrated into education and everyday life, the school recognises both their benefits and potential safeguarding risks. Staff will remain alert to how students may use AI, especially in ways that could impact online safety, data privacy, or wellbeing. This includes emerging risks such as AI-generated bullying - for example, the creation of fake images (deepfakes), harmful content using chatbots, or AI-edited videos designed to harass, humiliate, or target individuals.

As wearable technology becomes increasingly common, including smartwatches, fitness trackers, smart glasses, wearable cameras, and devices capable of recording, communicating, or accessing the internet, St George's School recognises the safeguarding risks these technologies may present.

Risks associated with wearable technology may include:

- Unauthorised recording, photographing, or live streaming of pupils, staff, or school activities

- Circumventing school filtering and monitoring systems through independent Internet connectivity
- Online bullying, harassment, or harmful peer interactions facilitated through wearable devices
- Accessing inappropriate or harmful content during the school day
- Location sharing, tracking, or collection of personal data that could place children at risk
- Use of wearable technology to facilitate examination malpractice, criminal activity, exploitation, or other safeguarding concerns

Staff should remain vigilant to the presence and use of wearable technology and recognise that safeguarding concerns may arise even where a device appears to have a non-communication purpose. Concerns relating to the misuse of wearable technology must be treated as safeguarding concerns where there is an actual or potential risk to a child.

Whilst we aim to prevent harm through the effective implementation of filtering and monitoring systems, our staff are also trained to identify signs of online harm and concerns relating to online safety must be reported to the DSL, whether the incident occurred inside or outside of school.

Children who experience online harm are supported through pastoral care, and where necessary, incidents are referred to external agencies such as social care, the police, or CEOP.

Children who may be causing technology-assisted harm to others will also be supported via pastoral care and provided the opportunity to engage with additional education into the impact of their behaviour. Safety plans will also be considered to prevent further incidents which will include consideration about the school issued iPad.

We take proactive steps to educate pupils through the curriculum, assemblies, and workshops on how to stay safe online. By promoting digital resilience and responsible online behaviour, we ensure that pupils are better equipped to recognise, avoid, and report online harm. Children will be educated through the curriculum about the safe, responsible, and ethical use of wearable technology, including privacy, consent, digital footprints, and the risks associated with recording, sharing information, and location-enabled services. St George's School will also ensure appropriate governance, risk assessment and oversight of AI tools used by staff and students.

## **Recognising and Responding to Sexual Harassment & Violence**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026), Part 5.**

At St George's School, we have a zero-tolerance approach to all forms of sexual harassment and violence. We recognise that these behaviours are never acceptable and can have a lasting impact on a child's wellbeing, safety, and ability to learn.

Sexual harassment and violence can occur between peers, as well as between adults and pupils, and may take place in person or online. This includes unwanted sexual comments or jokes, sharing of sexual images or videos without consent, physical acts of a sexual nature without consent or pressuring someone into sexual activity.

Our staff are trained to recognise the signs of sexual harassment and violence and understand that disclosures must be taken seriously. Any concern, disclosure, or allegation must be reported immediately to the DSL and recorded appropriately.

The school follows guidance set out in *Keeping Children Safe in Education* and *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges*. Victims are supported with care and sensitivity, ensuring they are listened to and offered appropriate support. Safety plans are completed as needed to ensure the safety and wellbeing of all pupils involved and where necessary, referrals are made to children's social care or the police.

St George's School have bullying classifications (**Appendix 3**) to support safeguarding teams understand the severity of an incident. These classifications should be applied in all incidents of harmful sexual behaviour and those which meet the level of category three must be reported via the Critical Incident System. **Appendix 4** also provides helpful guidance in understanding the context of harm, specifically for digital sexual communication.

Through a whole-school approach that promotes respect, healthy relationships, and open discussion, St George's School works to prevent sexual harassment and violence and ensures a safe, respectful environment for all.

## **Recognising and Responding to FGM**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraph 44 & page 170-172.**

KCSIE explains that 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*".

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

Indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in KCSIE.

**Any teacher** who either:

- Is informed by a girl under eighteen that an act of FGM has been conducted on her
- Observes physical signs which appear to show that an act of FGM has been conducted on a girl under eighteen and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and they can be supported by the DSL or Headteacher to report this.

Any other member of staff who discovers that an act of FGM appears to have been conducted on a pupil under eighteen must speak to the DSL without delay and follow our local safeguarding procedures.

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been conducted or discovers that a pupil aged eighteen or over appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures.

### **Recognising and Responding to Exploitation**

**This section should be read in conjunction with *Keeping Children Safe in Education (2026)* paragraphs 36-42 and page 156-158 and *Crime and Policing Act 2026*.**

We are committed to safeguarding pupils from all forms of exploitation, including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines activity, and trafficking. We understand that exploitation can happen to any child or young person, regardless of background, and often involves coercion, manipulation, or deception.

Possible indicators of exploitation may include unexplained gifts, money, or possessions, changes in behaviour, such as aggression, secrecy, or becoming

withdrawn, regularly going missing or being found in areas far from home, involvement in crime or substance misuse or relationships with older individuals or controlling adults.

Any concerns relating to exploitation are treated as safeguarding issues and must be referred promptly to the DSL. The DSL will assess the situation and make referrals to appropriate safeguarding partners or specialist services as needed. Support is offered to the young person throughout, with a focus on safety, empowerment, and recovery. Safeguarding teams have access to the Birmingham Youth Violence and Exploitation risk assessment and triage tools which must be used in incidents of youth violence and exploitation concerns to inform decision making and aid multi-agency collaboration.

We acknowledge that incidents of Financially Motivated Sexual Extortion, known as sextortion, can be a sensitive topic and children experience many barriers to disclosing this. At St George's School we have a protocol to allow for children to contact the DSL's directly for support which is shared during PSHE and Form times within our school.

At St George's School, we are proactive in raising awareness, educating pupils about the risks of exploitation, and working in partnership with external agencies, to protect and support those affected.

### **Recognising and Responding to Serious Youth Violence**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraphs 49-54 and pages 169.**

We recognise that serious youth violence can have a significant impact on the safety, wellbeing, attendance, emotional health, and life chances of children and young people. Serious violence may occur within communities, peer groups, schools, public spaces, or online and can affect children as victims, perpetrators, or witnesses. We understand that involvement in serious violence is often complex and can be linked to trauma, exploitation, adverse childhood experiences, discrimination, unmet needs, or exposure to violence within the home or community.

Serious youth violence can include assault, robbery, weapon-enabled incidents, gang-associated violence, threats of violence, intimidation, coercion, and violence connected to child criminal exploitation or county lines activity. We recognise that many children involved in violence are themselves vulnerable and may be experiencing significant harm.

Any concerns regarding serious youth violence must be treated as safeguarding concerns and reported immediately to the DSL. Staff should not assume that violent

behaviour is solely a behaviour or discipline issue and should consider the wider context of the child's experiences, vulnerabilities, and potential exploitation.

The DSL will assess concerns using available local safeguarding tools. Where appropriate, they will work with children, families, police, children's social care, youth justice services, violence reduction partnerships, and other relevant agencies to reduce risk and promote safety. Safety planning will be considered for any child identified as being at risk of serious violence, whether as a victim, perpetrator, or both.

We are committed to adopting a child-first, trauma-informed approach. Children involved in serious youth violence will be supported through pastoral interventions, targeted safeguarding plans, and opportunities to build protective factors, strengthen positive relationships, and remain engaged in education. Exclusion or punitive responses alone are unlikely to reduce risk and should always be considered alongside the school's safeguarding responsibilities.

Through our curriculum, personal development programme, and partnership working, St George's School seeks to educate pupils about the risks associated with violence, weapon carrying, exploitation, and harmful peer influences. We aim to develop students' resilience, conflict resolution skills, emotional regulation, and understanding of positive relationships, helping them to make safe and informed choices and contribute positively to their communities.

### **Recognising and Responding to Radicalisation and Extremism**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) page 166-168.**

We are committed to protecting pupils from the risks of radicalisation and extremism as part of our wider safeguarding responsibilities. We recognise that children and young people can be vulnerable to extremist ideologies and radicalisation, both online and offline.

We fulfil our duties under the *Counter-Terrorism and Security Act* 2015, including the Prevent Duty, which requires schools to have due regard to the need to prevent people from being drawn into terrorism.

We will achieve this by ensuring our staff receive training to help them identify signs of radicalisation including being alert to changes in behaviour, language, or attitudes that may indicate a child is being influenced by extremist ideologies.

Concerns about radicalisation are treated as safeguarding issues and must be reported immediately to the DSL. The DSL will assess the risk and, where appropriate,

refer to the local Prevent team, Channel programme, or other external agencies for support. The DSL should also make use of the St George's School Prevent Risk Assessment unless an alternative multi-agency plan is in place.

By fostering an inclusive environment that promotes respect, diversity, and critical thinking, St George's School helps build students' resilience to radicalisation and supports their personal development and safety.

### **Recognising and Responding to Gendered Harm**

St George's School recognises that gendered harm – abuse or discrimination that is rooted in gender norms, roles, or inequalities – can significantly impact the safety, wellbeing, and development of children and young people.

We specifically recognise Violence Against Women and Girls (VAWG) as a serious safeguarding concern. VAWG encompasses a range of harmful behaviours which disproportionately impact women and girls, including domestic abuse, sexual violence, harassment, coercive control, female genital mutilation (FGM), forced marriage, and so-called “honour”-based abuse.

We are committed to fostering a culture of zero tolerance towards all forms of VAWG. Staff are trained to identify indicators of abuse and to respond sensitively and appropriately, ensuring the safety and wellbeing of affected students. All concerns are recorded and acted upon in line with statutory safeguarding guidance and our internal procedures.

We also recognise that toxic masculinity particularly prevalent on-line in the “manosphere” – promote the enforcement of rigid and harmful ideologies around male behaviour, such as dominance, suppression of emotions, and aggression – can contribute to VAWG related concerns and wider safeguarding concerns. It may underpin bullying, gender-based violence, homophobia, transphobia, and the marginalisation of students who do not conform to stereotypical gender expectations.

We are committed to challenging harmful gender norms and promoting a culture of respect, inclusion, and emotional wellbeing for all students. Staff are alert to behaviours rooted in toxic masculinity that may pose a risk to individual pupils or the wider school environment. Where concerns arise, they will be addressed swiftly and in line with our safeguarding procedures, with a focus on education, early intervention, and support.

Preventative education is integrated into the curriculum to promote respect, equality, and healthy relationships. The school works in partnership with families, external agencies, and the wider community to support affected pupils and to challenge

harmful attitudes and behaviours and have Operation Encompass trained staff who will work with police to ensure in school support is implemented and provided for victims and vulnerable children.

### **Recognising and Responding to Vaping and Substance Misuse**

St George's School does not tolerate the use, possession, or distribution of vapes, tobacco, alcohol, or illegal substances on school grounds or during any school-related activity. Vaping and substance misuse pose serious health risks and may indicate wider safeguarding concerns such as exploitation.

Staff are to remain vigilant and report any signs of substance misuse, including vaping, or concerns that arise outside of school. This may include information disclosed by students, observations in the community, or concerns raised by parents or external agencies.

Preventative education is provided through the curriculum and pastoral support to inform students of the risks and support healthy choices. Our school will also work with local health and support services to offer early intervention and targeted support where appropriate.

Where there are reasonable grounds to suspect a student is in possession of a prohibited item, a search may be conducted by authorised staff in line with the DfE Search and Screen guidance and the St George's School Behaviour Policy. Any incidents will be reported to the DSL and managed in accordance with safeguarding and behaviour procedures which focus on educating and empowering children to make healthy choices.

### **Safeguarding Transgender and Gender Questioning Students**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraphs 252-282.**

We are committed to ensuring that every child is known, valued and supported. Guided by the St George's School ethos, we seek to create a community where all pupils can flourish, are treated with dignity and respect, and are safeguarded from harm. We recognise that questions relating to gender identity can be complex and deeply personal, and that each child's circumstances are unique and this can on occasion make the child more vulnerable. The School takes a strong and proactive stance on any form of bullying based on gender. The School will appropriately sanction any cases of bullying or harassment, but also be aware and conscious of the rights of pupils and staff in relation to their religion and beliefs.

Any child who discloses that they are questioning their gender identity, or who requests support in relation to a social transition, will be listened to compassionately and without judgement. Such disclosures will be considered through a safeguarding lens where appropriate, with the child's welfare, voice, wellbeing and best interests remaining central to all decision-making.

Social transition is where a child seeks to present and be treated as the opposite biological sex, and requests changes or support from a school or college to facilitate that presentation.

Where a child is living, or wishes to live, in stealth, the school will carefully consider any safeguarding, welfare and operational implications. Decisions will be made on a case-by-case basis, taking account of the child's best interests, legal requirements and the need to ensure appropriate safeguarding arrangements are in place.

St George's School will work in partnership with parents and carers wherever possible and recognises that they have a vital role in supporting their child. In the vast majority of cases, parents or carers will be informed of, and involved in, discussions regarding requests for social transition. The views of parents and carers will be given significant consideration as part of the decision-making process. However, where there is reason to believe that parental notification may place a child at risk of significant harm, the School will take advice from external agents where needed and act in accordance with safeguarding procedures, always prioritising the welfare of the child.

Requests relating to gender identity or social transition will be considered on an individual basis, taking account of the child's wishes, parental views, safeguarding considerations, relevant clinical information where available, and the School's legal responsibilities. Decisions will not be predetermined and will be made in the best interests of the child while balancing the rights and needs of all members of the school community. Where a child shares feelings relating to their gender identity but does not request any change to their treatment within the school, staff will ordinarily respect that confidence unless there are safeguarding concerns indicating that the child or another person may be at risk of harm.

Staff must follow the school safeguarding policy and related guidance within *Keeping Children Safe in Education 2026* when supporting pupils who are questioning their gender, but in most cases, DSL's will take lead. When responding to any disclosure, enquiry or request relating to gender identity or social transition. The guidance provides the framework for decision-making, clarifies safeguarding responsibilities, and outlines the processes for engaging with pupils and parents to ensure responses are lawful, compassionate, consistent and child-centred.

## **Safeguarding Young Carers**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraph 246.**

A young carer is a child or young person under the age of 18 who provides, or intends to provide, care, assistance or support to another family member, often because of illness, disability, mental ill-health, substance misuse or additional support needs.

St George's School recognises that young carers may face additional safeguarding and welfare challenges as a result of their caring responsibilities. Caring responsibilities can have a significant impact on a child's attendance, attainment, behaviour, emotional wellbeing, ability to participate fully in school life and overall development.

Staff should be alert to indicators that a child may be a young carer and recognise that children do not always identify themselves as such. Early identification is important to ensure that young carers receive the right support at the right time.

Where a child is identified as a young carer, the school will work in partnership with the child, their family and relevant agencies to understand the impact of their caring responsibilities and provide appropriate support. This may include pastoral support, family help intervention, reasonable adjustments within the school, and signposting or referral to specialist young carer services.

Where caring responsibilities raise concerns about a child's welfare, safety, wellbeing or unmet needs, these concerns will be considered through the school's safeguarding procedures.

## **Safeguarding within Early Years Settings**

**This section should be read in conjunction with *Early Years Foundation Stage (EYFS)* statutory framework, Section 3.**

We recognise that safeguarding in the Early Years Foundation Stage (EYFS) requires particular attention due to the age and vulnerability of the children. We are fully committed to creating a nurturing, safe, and responsive environment that promotes the physical, emotional, and developmental wellbeing of all our youngest pupils.

St George's School is committed to ensuring that all children in our Nursery, Reception, and two-year-old provision are safe, healthy, and able to learn and develop in a secure environment. To achieve this, we ensure:

- A safe and secure learning environment where children are visible, supervised, and always listened to

- A named person responsible for safeguarding in the Early Years setting
- At least one member of staff with a current paediatric first aid certificate is always present on site
- A qualified first aider accompanies children on all off-site visits
- Each child has a designated key worker to provide consistent care and maintain effective communication with parents and carers
- Routine monitoring of health and safety practices to promote the ongoing safety and welfare of all children
- Staffing ratios and staff qualifications comply with statutory requirements and are sufficient to meet the individual needs of each child
- Staff will be aware of the Intimate Care Policy and leaders will ensure that this can be followed
- Leaders will ensure that all EYFS provision complies with the safeguarding and welfare requirements of the current EYFS Statutory Framework and associated statutory guidance

### **Safeguarding within Post-16 Settings**

We acknowledge that in our school with post-sixteen provision there will be occasions where students will turn eighteen and therefore legally become adults. We recognise that although 18-year-olds are legally adults, they may still be vulnerable and require safeguarding support, particularly within an educational setting. We maintain our duty of care and apply the same robust safeguarding principles to all students, regardless of age.

Any concerns about the welfare of an 18-year-old will be addressed with the same level of seriousness and in line with our safeguarding procedures, with additional consideration given to their legal rights as adults. The School will also ensure they are aware of and use local adult safeguarding arrangements where necessary.

### **Learning from Safeguarding Incidents**

Whilst we strive to provide the best possible level of care and support to our students, we acknowledge that on occasions it does not always go right. It is important we pause and reflect on these incidents.

Within St George's School a review process of significant events with a formal post-incident review and support process to address significant safeguarding incidents, unanticipated exclusion, critical incidents, and violent assaults. The meetings chaired by the Headteacher / DSL's and Chair of the Trustees will review the antecedent factors, documentation, statements, CCTV footage and any other relevant information with those relevant staff and appropriate external partners. The aim will be to ensure

school-wide learning and review of policies and procedures can be fed back with the intention of reducing future occurrences.

### **3. Attendance and Children Missing from Education**

**This section should be read in conjunction with *Keeping Children Safe in Education (2026)* paragraph 219.**

St George's School recognises that regular school attendance is essential for children to achieve their full potential and is a key indicator of their safety and wellbeing. Persistent absence or unexplained patterns of absence can be a safeguarding concern and will be treated as such. Those on reduced timetables or who parents propose elective home educated, may also be at increased risk. All staff are expected to be alert to the link between absence and potential safeguarding concerns.

#### **Attendance Monitoring**

- The school records attendance daily using its management information system
- Absence is followed up promptly by staff, and patterns of persistent or unexplained absence are reported to the DSL
- Attendance concerns are addressed early through supportive engagement with pupils and families

#### **Children Missing Education (CME)**

- Any child who is absent for ten consecutive school days without explanation, or earlier if there are significant safeguarding concerns, will be referred to the Local Authority in line with *Children Missing Education (2024)* guidance and local processes
- The DSL is responsible for ensuring that such cases are recorded as safeguarding concerns where appropriate and escalated in accordance with local protocols and that all relevant documents and correspondence are stored within CPOMS

#### **Safeguarding Considerations**

The DSL will be alerted to any attendance concerns, particularly where there are known safeguarding risks. Non-attendance or sudden withdrawal from school can be indicators of abuse, neglect, ineffective management of a medical condition, exploitation, or other risks such as Female Genital Mutilation (FGM), forced marriage, modern slavery or trafficking. Children who are repeatedly removed from lessons, on reduced timetables, or experiencing persistent absence will be considered for early help and safeguarding assessment. The school will always consider the context of a

child's absence and will work with external agencies, including the Education Welfare Service and social care, as necessary.

More information about how attendance and concerns relating to attendance are managed can be found in the St George's School Attendance Policy.

#### **4. Emotional Wellbeing and Mental Health**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraphs 45-48 and 224-232.**

St George's School plays a vital role in supporting the mental health and emotional wellbeing of students. Clear systems are in place to identify concerns, escalate issues, and ensure accountability. Staff are trained to spot warning signs and to act when mental health issues also raise safeguarding concerns.

Mental health and emotional wellbeing education is embedded in the RSE and PSHE curriculum to help students develop the knowledge and skills to stay healthy and safe.

While only trained professionals should diagnose mental health conditions, all concerns must be taken seriously. Staff, friends, and parents may find it challenging to respond, especially in cases like self-harm or eating disorders. Support is available for everyone involved, including peers and families, to ensure a compassionate, informed response. Mental health concerns must be treated as safeguarding concerns where there is risk of harm, including self-harm, suicidal ideation, or severe emotional distress.

This means in our school we will ensure there is access to a trained Senior Mental Health Lead and trained Mental Health First Aiders, integrate emotional wellbeing education into the curriculum, actively promote open conversations about emotional well-being and ensure staff access training in mental health awareness to help identify and support students in need.

This also means St George's School will provide school staff with high-quality information, advice, and guidance from the relevant professional bodies to support staff in safety planning, case consultation and developing a whole-school approach to emotional wellbeing.

Where concerns relating to suicidal ideation, suicide risk or significant self-harm are identified, a safety plan should be considered and appropriate support sought through the national mental health team, local mental health services, NHS 111 Mental Health or emergency services where required.

## 5. Opportunities to Teach Safeguarding

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraphs 156-161.**

Our school are committed to preventative education that prepares students for life in modern Britain and promotes a zero-tolerance culture towards racism, misogyny, misandry, sexism, LGBTQ+ discrimination, derogatory behaviour, prejudice-based bullying, sexual harassment, sexual violence and other forms of physical violence and conflict and the close links these issues may have to harmful sexual behaviours or harmful online materials.

This is supported by the school's behaviour policy, pastoral care, and a well-planned, evidence-based RSE Relationships and Sex Education (RSE) curriculum. Lessons are inclusive and age-appropriate, especially for students with SEND or additional vulnerabilities, and focus on safeguarding as a form of protection, not punishment.

Key topics include:

- Healthy relationships and consent
- Body confidence and self-esteem
- Equality, stereotyping, and prejudice
- Recognising and addressing abuse and coercion
- Understanding laws related to sexual exploitation, grooming, FGM, and domestic abuse (sometimes child to parent)
- Critical evaluation of online information, including recognising misinformation, disinformation and AI-generated content
- How and where to seek support

This means each school will teach children to be safe by creating a supportive environment where safeguarding is embedded across the curriculum and daily life and through the lens of the St George's School School aims and our commitments to UNICEF's Convention on the Rights of the Child. Regular assemblies, workshops, and collaboration with external experts can further equip students with the knowledge, confidence, and skills to protect themselves and others in a variety of situations.

We will ensure our school has access to a high-quality personal development curriculum and provides the scope to be responsive to local need. We will also support in providing the resources for targeted awareness activities, such as Mental Health Awareness Week, ensuring they are aligned with the St George's School ethos, values, school aims and current best practices.

The results of the school filtering & monitoring technology will help focus curriculum development and ad-hoc delivery of assemblies etc... on the key contextual safeguarding issues faced by the student body.

## **6. Leadership of Safeguarding**

### **Working in Partnership and Information Sharing**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) paragraphs 138-150.**

Safeguarding is most effective when it is underpinned by strong partnerships and robust, timely information sharing (within 5 days). We are committed to working collaboratively with children, parents, carers, external agencies, and safeguarding partners to protect and promote the welfare of all pupils.

We foster an open, honest, and supportive relationship with parents and carers, encouraging them to share any concerns they have about their child's wellbeing, and engage with a range of agencies including children's social care, health services, the police, and local safeguarding partners to ensure a coordinated approach to safeguarding concerns.

The school also works in partnership with other schools, educational settings, and community organisations to support transitions and safeguard pupils beyond our own setting. We will specifically work closely with provisions where our children attend as part of an alternative provision arrangement or off-site direction and will retain overall responsibility for their safeguarding.

We recognise that clear and timely information sharing is vital to identifying, assessing, and responding to safeguarding concerns. All staff understand that safeguarding concerns must be shared with the DSL, and that fears about sharing information should not stand in the way of protecting a child.

Our DSLs are trained, and have agency, to make informed decisions about when to make referrals to partner agencies in line with their local multi-agency safeguarding arrangements and threshold guidance and to escalate concerns when they feel a stronger advocacy role is required.

Information is shared in line with the principles set out in *Working Together to Safeguard Children* and *Keeping Children Safe in Education*, with the appropriate individuals and agencies on a "need-to-know" basis and in a secure and professional manner, respecting confidentiality and data protection laws (including UK GDPR, Data Protection Act 2018 and Data Use and Access Act (DUAA) 2025).

## **Confidentiality and Record Keeping**

Safeguarding children requires a culture of trust, transparency, and accountability. All staff must be aware that safeguarding information is confidential and handled with care, in line with data protection laws and statutory guidance.

### **Confidentiality**

Safeguarding concerns should only be shared with those who need to know to take appropriate action. Information must not be discussed publicly or shared unnecessarily. Staff must never promise a child that they will keep a disclosure secret, and should explain when information will be shared, with whom, and why in child focussed way.

### **Record Keeping**

All safeguarding concerns, discussions, decisions, and actions must be recorded clearly and promptly using the school's CPOMS. Records must be:

- Accurate, factual, and objective
- Updated in a timely manner as new information arises
- Include child voice at every opportunity

### **Storage and Transfer**

Safeguarding records are stored securely with restricted access. When a child transfers to another school or setting, their safeguarding file will be transferred confidentially and directly to the new DSL, in line with DfE guidance.

### **Data Sharing**

Safeguarding records will only be shared in line with St George's School's Data Protection Policy and Subject Access Request Policy. When statutory agencies, such as police, request safeguarding information from us it will only be processed on the receipt of appropriate documentation and with the authorisation of the Headteacher and the Data Protection Officer.

The DSL is responsible for ensuring records are maintained in accordance with national and local guidance and that staff are trained in appropriate information handling practices.

### **Filtering and Monitoring**

**This section should be read in conjunction with *Keeping Children Safe in Education (2026)* paragraphs 171-175.**

At St George's School, we recognise the importance of providing a safe and secure digital environment for all pupils and staff. Effective filtering and monitoring are key

components of our safeguarding strategy to protect children from harmful online content, including radicalisation, grooming, cyberbullying, and access to inappropriate material.

All staff are trained to understand the importance of digital safeguarding and how to report concerns related to online activity. Pupils are also educated about online safety through the curriculum, helping them develop critical thinking and responsible online behaviour.

Our school uses a robust, age-appropriate internet filtering and monitoring system to block access to harmful or unsuitable content and to track and log online activity on the school network and devices, ensuring any concerning behaviour or attempts to access inappropriate material can be quickly identified and addressed. Safeguarding teams will be proactive in responding to concerns raised and use the regular filtering report to inform the whole-school strategy for online safety.

Filtering and monitoring systems are regularly reviewed and updated to respond to emerging threats, changes in pupil usage, and updates in guidance. The Designated Safeguarding Lead and Headteacher works closely with the IT team to oversee filtering and monitoring practices.

St George's School's filtering and monitoring system applies to all devices connected to the school's network, including school-owned devices and, where appropriate, personal devices used on-site. Our system will also work on school devices used on external networks. The effectiveness of filtering and monitoring systems is reviewed at least annually.

## **7. Maintaining a Safe Workforce**

### **Safer Recruitment**

**This section should be read in conjunction with *Keeping Children Safe in Education* (2026) Part 3. Further details are provided in Appendix 5.**

As part of our commitment to safeguarding and ensuring the safety of our students we adhere to robust safer recruitment processes set out within *Keeping Children Safe in Education*.

Through these measures, we strive to ensure that everyone who works in our school is suitable to do so and understands their responsibility in safeguarding the children in our care.

More information regarding our safer recruitment processes can be found within the current St George's School's Safer Recruitment and Selection Policy.

### **Concerns about Staff, Visitors or Contractors**

At St George's School, we are committed to creating a culture of openness, trust, accountability, and professional curiosity. We recognise that safeguarding children requires vigilance not only in relation to risks outside the organisation, but also in relation to the conduct of adults who work with, volunteer alongside, or otherwise have access to children. We acknowledge that allegations and concerns can arise in any organisation and that creating an environment where concerns are raised promptly is a vital part of keeping children safe.

All adults working within our school have a responsibility to maintain appropriate professional boundaries and to act as positive role models for children and young people. Any concern about the behaviour, conduct, suitability, or professionalism of an adult must be taken seriously and acted upon promptly. This includes concerns arising both within and outside of the workplace where the behaviour may indicate that an adult poses a risk to children.

Concerns may relate to allegations that an adult 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
- Behaved towards a child or children in a way that indicates they may pose a risk of harm
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Violated professional boundaries, including inappropriate communication, favouritism, grooming behaviours, or misuse of technology
- Demonstrated conduct outside of work that may create safeguarding concerns or damage public confidence in their suitability to work with children

We also recognise the importance of identifying and responding to low-level concerns. A low-level concern is any concern, no matter how small, that an adult's behaviour may be inconsistent with the staff code of conduct, professional standards, or the culture of safeguarding expected within St George's School. Individually, such concerns may not meet the threshold for referral to the Local Authority Designated Officer (LADO), however patterns of behaviour can emerge over time. Staff should never assume that somebody else will report a concern and should always share information with the appropriate leader.

All concerns, regardless of perceived severity, must be reported immediately:

- Concerns relating to school-based staff, trainee teachers, volunteers, visitors, contractors, or supply staff should be reported to the Headteacher
- Concerns involving the Headteacher should be reported to the Chair of the Board of Trustees
- Concerns involving the Chair of the Board of Trustees should be reported to the Local Authority Designated Officer (LADO)
- Where a child is believed to be at immediate risk of harm, staff should contact the police and / or children's social care without delay and then inform the appropriate leader

The safety and welfare of children will always be the primary consideration. When a concern is raised, the school will respond promptly, proportionately, and fairly, ensuring that children are protected whilst also supporting the rights of all parties involved. Confidentiality will be maintained as far as possible and information will only be shared on a need-to-know basis.

The Headteacher, acting as case manager, will seek advice from the LADO where the concern meets the harms threshold. Prior to consultation with the LADO, only basic fact-finding enquiries should be undertaken to establish the nature of the concern. Investigations must not be conducted in a way that could compromise any future police, social care, disciplinary, or regulatory process.

The LADO must be informed of all allegations that meet the harms threshold and will advise on the appropriate next steps, including liaison with police, children's social care, professional regulators, or other agencies as required. Internal investigations will only proceed where it is appropriate to do so and in accordance with the advice provided by external agencies.

The use of suspension is not an automatic response to an allegation. Decisions regarding alternative duties, redeployment, risk management measures, or suspension will be made on a case-by-case basis following consultation with relevant St George's School Trustee's and external agencies where appropriate. The school will always seek to balance the welfare of children, the integrity of the investigation, and the rights of the individual concerned.

Support will be made available to all individuals affected by the process, including the child or children involved, the person who raised the concern, witnesses, and the adult who is subject to the allegation. St George's School recognises that safeguarding investigations can be highly stressful and is committed to ensuring appropriate welfare support throughout the process.

As a learning organisation, St George's School is committed to reviewing safeguarding incidents, allegations, and low-level concerns to identify themes, strengthen practice, and improve our systems. Where appropriate, lessons learned will inform policy development, staff training, supervision, and organisational safeguarding arrangements to further enhance the safety of children and young people.

## **8. Responsibilities**

### **Role of the Designated Safeguarding Lead**

The role of the DSL is outlined in *Keeping Children Safe in Education* (2026), Annex B. In addition to statutory responsibilities, at St George's School we also expect our DSLs to fulfil the following:

- In addition to statutory training, the DSL is expected to complete a DSL course on Leading Safeguarding
- Maintain a list of those students deemed to be vulnerable
- Ensure that families are fully aware of the school's safeguarding policies and procedures and are kept informed and involved as appropriate
- Liaise with the Senior Mental Health Lead, St George's School Mental Health Team, and local mental health services as appropriate to support student wellbeing
- Undertake the St George's School annual safeguarding audit in collaboration with the Headteacher and Deputy DSL's
- Maintain the CPOMS system in-line with the school's requirements around recording and reporting
- Discuss and monitor the progress, attainment, and aspirations of children known and previously known to social care, ensuring accurate vulnerability recording within CPOMS, and submit safeguarding data as required

During term time and normal school hours, a DSL will always be available in our school. For most of the time, this will mean a DSL being on-site. The school will maintain robust arrangements to ensure safeguarding concerns can be received, monitored and acted upon whenever the DSL is unavailable. This may include deputy DSL arrangements and shared safeguarding mailboxes.

### **Role of the Headteacher**

The Headteacher is accountable for the effective safeguarding and protection of all children within the school. This includes ensuring that safeguarding policies and procedures are fully embedded in practice and consistently followed by all staff. The Headteacher will:

- Lead the development of a strong safeguarding culture across the school and any wider community initiatives
- Ensure full implementation of this safeguarding policy and all related procedures, with robust systems in place to monitor their effectiveness
- Ensure the completion of the local authority Section 175 Annual Safeguarding Audit and report findings, including action plans, to the Headteacher and designated Trustee
- Ensure the Designated Safeguarding Lead (DSL) maintains lead responsibility for safeguarding and child protection, even where specific tasks are delegated to trained deputies
- Hold weekly meetings with the DSL and engage regularly with the school's safeguarding team
- Will ensure compliance with relevant statutory guidance relating to participation in sport and single-sex sporting activities
- Will ensure appropriate and safe arrangements relating to toilets, changing facilities and showers in line with statutory guidance, safeguarding duties and relevant health and safety requirements

Working in partnership with the DSL team, the Headteacher will also ensure:

- All staff are trained to recognise signs of harm (that may often overlap) and abuse, are vigilant, and know how to respond appropriately, including making referrals to family help and statutory services
- A strong culture of listening to children is promoted, ensuring that their views, wishes, and concerns are considered and acted upon
- The academic progress and wellbeing of vulnerable pupils – particularly those with a social worker or those students previously known to children's services are closely tracked and supported
- A consistent, positive behaviour approach is implemented, aligned with the principles of the St George's School ethos
- Staff and volunteers receive appropriate safeguarding training and have the skills, knowledge, and understanding needed to protect children in all contexts, including trips, visits, off-site activities and alternative provision, in accordance with *Keeping Children Safe in Out-Of-School Settings* guidance

In addition, the Headteacher will:

- Appoint a designated teacher responsible for promoting the educational achievement of looked-after and previously looked-after children, and for supporting pupils with SEN and SEND, ensuring this person receives appropriate training

- Ensure that safeguarding policies and procedures are clearly communicated to all staff, students, parents, and visitors
- Appoint a deputy DSL to provide additional safeguarding capacity and ensure continuity of provision
- Support the DSL by ensuring appropriate workload management, allowing time for urgent safeguarding responses, meetings, and case conferences
- Ensure that the names and contact details of the DSL and deputy DSL are clearly displayed in staff areas, included in the staff handbook, and published on the school website
- Ensure safer recruitment practices are followed and take immediate and appropriate action in response to any allegations made against staff including regular monitoring of the pre-employment processes via the single central record
- Oversee the implementation of the St George's School Health and Safety Policy, to provide a safe and secure environment for all students and staff, fulfilling the school's statutory responsibilities

### **Safeguarding Governance**

The St George's School Board of Trustees holds strategic leadership responsibility for safeguarding arrangements across the school. It ensures that safeguarding policies, procedures, training, and web filtering systems are always effective and fully compliant with current legislation.

To support this responsibility, the Board will:

- Appoint a named trustee with specific oversight of safeguarding and child protection, with clearly defined objectives and outcomes
- Monitor that every staff member within St George's School receives annual safeguarding training delivered via appropriate and accessible formats
- Ensure that Trustees receive annual safeguarding training that enables them to strategically challenge and evaluate the effectiveness of safeguarding practices across the organisation

The Senior Lead DSL, as delegated by the Board of Trustees, is accountable for safeguarding across the school. The Headteacher reports to the Board of Trustees on safeguarding matters, ensuring transparency and accountability at the highest level.

The DSL Team along with our Safeguarding Advisor, play a key role in upholding St George's School's commitment to the safety and wellbeing of all children. Its purpose is to provide guidance and ensure the consistent implementation of best safeguarding practices across all St George's School.

Together, this group ensures that all school adopt effective safeguarding policy and practice in line with St George's School's vision: that every child has the right to protection from harm and to thrive in a safe and nurturing environment.

### **Training Requirements**

All staff receive an induction which includes safeguarding training, and this training is refreshed annually. All staff should also receive additional training or briefings throughout the academic year to further upskill them on safeguarding topics, particularly those prevalent within their setting.

Those with a designated safeguarding role, including the Headteacher, within St George's School must complete the Designated Safeguarding Lead training course approved by St George's School which meets the requirements set out in *Keeping Children Safe in Education*. They are also expected to complete additional training in response to latest guidance or best practice so that the quality of safeguarding within our school remains high.

School safeguarding staff are also encouraged to participate in local arrangements such as training provided by their local safeguarding children partnership or DSL network groups.

### **Statutory Requirements**

This policy has been developed in line with the following key documents:

- Keeping Children Safe in Education 2026 (Statutory Guidance for Schools and Colleges), Department for Education, September 2026
- Working Together to Safeguard Children 2026, HM Government, March 2026
- Education inspection framework, November 2026 Ofsted
- Mental Health and Behaviour in Schools: Departmental Advice for School Staff, Department for Education, November 2018
- St George's School Online Safety Policy
- Education for a Connected World Framework, UK Council for Internet Safety (UKCIS), 2020
- Multi-agency Statutory Guidance on Female Genital Mutilation, HM Government, July 2020
- Revised Prevent Duty Guidance: England and Wales, Home Office, 2024
- The Education (Independent School Standards) Regulations 2014 (as amended) and associated Department for Education guidance
- The Children Act 1989
- The Children Act 2004
- The Education Act 2002

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Children Missing Education: Statutory Guidance for Local Authorities, Department for Education, September 2025
- Searching, Screening and Confiscation: Advice for Schools, Department for Education July 2022
- Relationships Education, Relationships and Sex Education (RSE) and Health Education, Department for Education July 2025
- Meeting Digital and Technology Standards in Schools and Colleges: Filtering and Monitoring Standards, Department for Education, June 2026
- Guidance for Schools and Colleges: Sharing Nudes and Semi-Nudes, UKCIS, March 2024
- Crime and Policing Act 2026

**To be reviewed September 2027  
or as and when statutory  
guidance / legislation changes**

## Appendix 1 – Dealing with a Disclosure of Abuse

It is important that all our staff know how to deal with a disclosure of abuse or neglect.

### Remember:

**If a pupil chooses to confide in you, it means they trust you and want you to help them. Dealing with a disclosure may be frightening, but you should also feel privileged that the child has chosen you to talk to.**

#### If you see or hear something that concerns:

- Don't ignore it
- Don't feel silly – if it worries you, someone else needs to know
- If it is related to a child being at risk – see the DSL, or Deputy DSL immediately and definitely before the child goes home that day
- Upload all information to CPOMS (and seek advice immediately from your DSL)
- If it is something related to safeguarding, but not a child whose safety is immediately at risk – inform the DSL via CPOMS
- All staff may raise concerns directly with Children's Services. If they feel an incident is not being dealt with appropriately, or they are unable to locate relevant staff
- Concerns about adults in the school should be made directly to the Headteacher

#### Dealing with disclosures of abuse:

- Always listen carefully and quietly – do not press for any evidence at all
- Remain calm and reassuring – do not dismiss the disclosure – do not show distress or concern
- Do not refute or try to belittle the allegation
- Show that you care through open and reassuring facial and body language
- Do not interrogate or ask leading questions (it could later undermine a case)
- Ensure you take a written verbatim account of the child's disclosure using the appropriate school Disclosure Form and upload onto CPOMS

#### At this point, take the following steps:

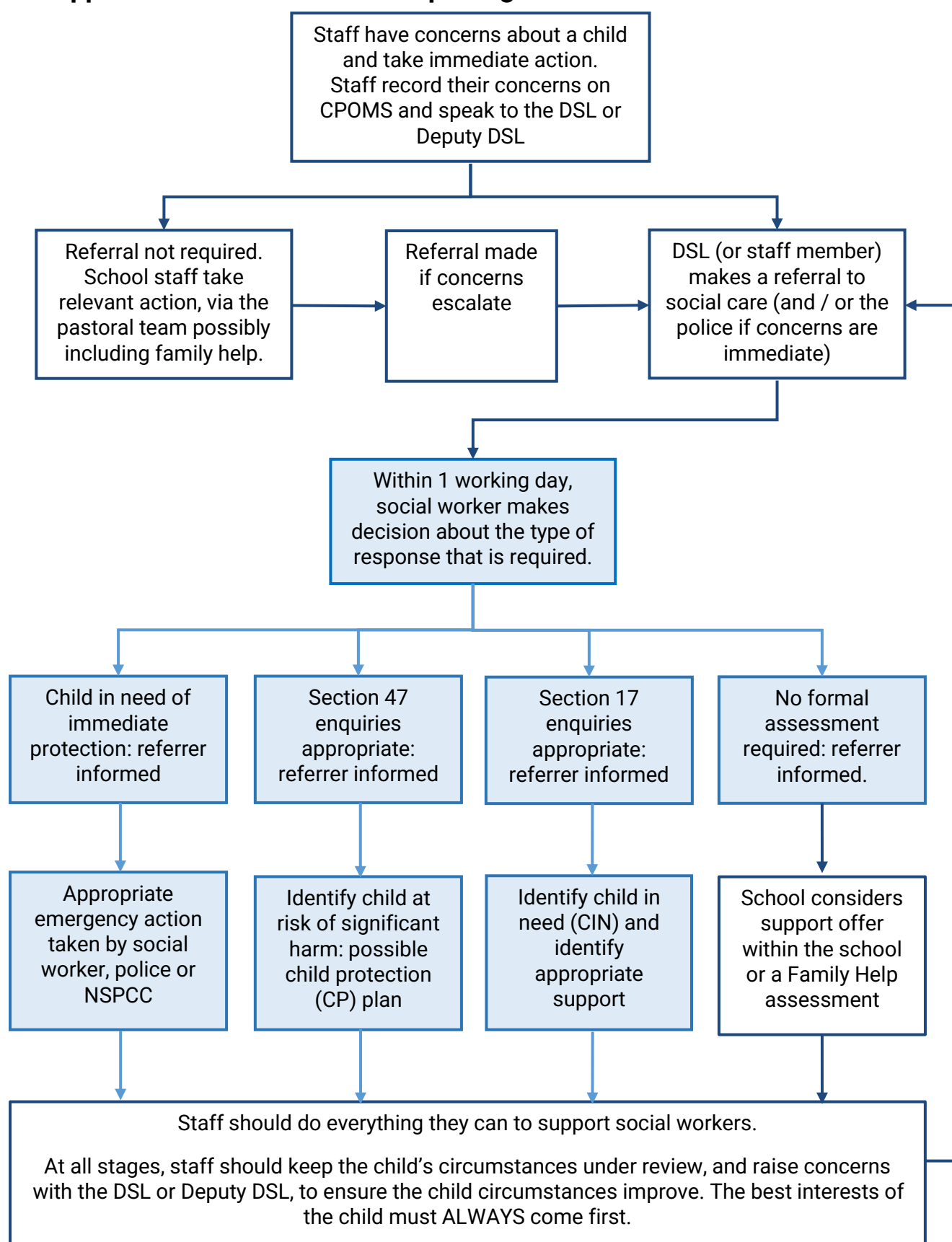
- Explain to the student that the disclosure must be reported – emphasise your trust in them
- Do not promise to keep the allegation secret or that 'everything will be alright'
- Reassure by telling the student that they have done the right thing in telling you, do not offer physical reassurance
- Do not admonish in any way e.g., 'I wish you had told me sooner'
- Inform the DSL initially verbally

Under no circumstances, discuss the matter with any other person - if the allegations prove to be untrue, any such discussion would be deemed defamatory.

#### With the DSL, prepare a detailed report itemising the information revealed by the student with absolutely no opinion:

- Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the school
- Date and sign any written record of events and action taken and keep confidential and secure
- You must keep, in absolute confidence, a copy of the report, as will the DSL

## Appendix 2 – Flow Chart for Reporting Concerns



## **Appendix 3 – Child-on-Child Abuse Descriptors of Sexual Harassment**

### **Don't turn a blind eye – challenge every incident**

Child-on-Child abuse is serious, and what be seen by young people as 'banter' is often more harmful than they realise. In most cases it is more likely that girls will be victims and boys perpetrators. It is our responsibility to challenge every incident and ensure we log concern for the following:

### **Category 1 – Harmful Sexual Behaviour**

Recorded on CPOMS

General single incidents of Cat 1 issues.

Including but not limited to:

- Developmentally inappropriate problematic (using the Brook Traffic Light System as a benchmark)
- Abusive sexualised behaviour on-line or off-line
- Lewd comments / jokes
- Creating a hostile, offensive or sexualised environment.

### **Category 2 - Sexual Harassment**

Recorded and discussed with the DSL, recorded on CPOMS as a safeguarding issue

Two or more Cat 1 incidents, or single incidents of Cat 2 issues Including but not limited to:

- Unwanted conduct of a sexual nature
- Up skirting
- On-line or off-line sexualised comments, remarks or observations
- Intentional touching of person or clothing
- Aggravated sexting
- Behaviours likely to violate dignity, feel intimidated, degraded or humiliated
- Creating a hostile, offensive or sexualised environment

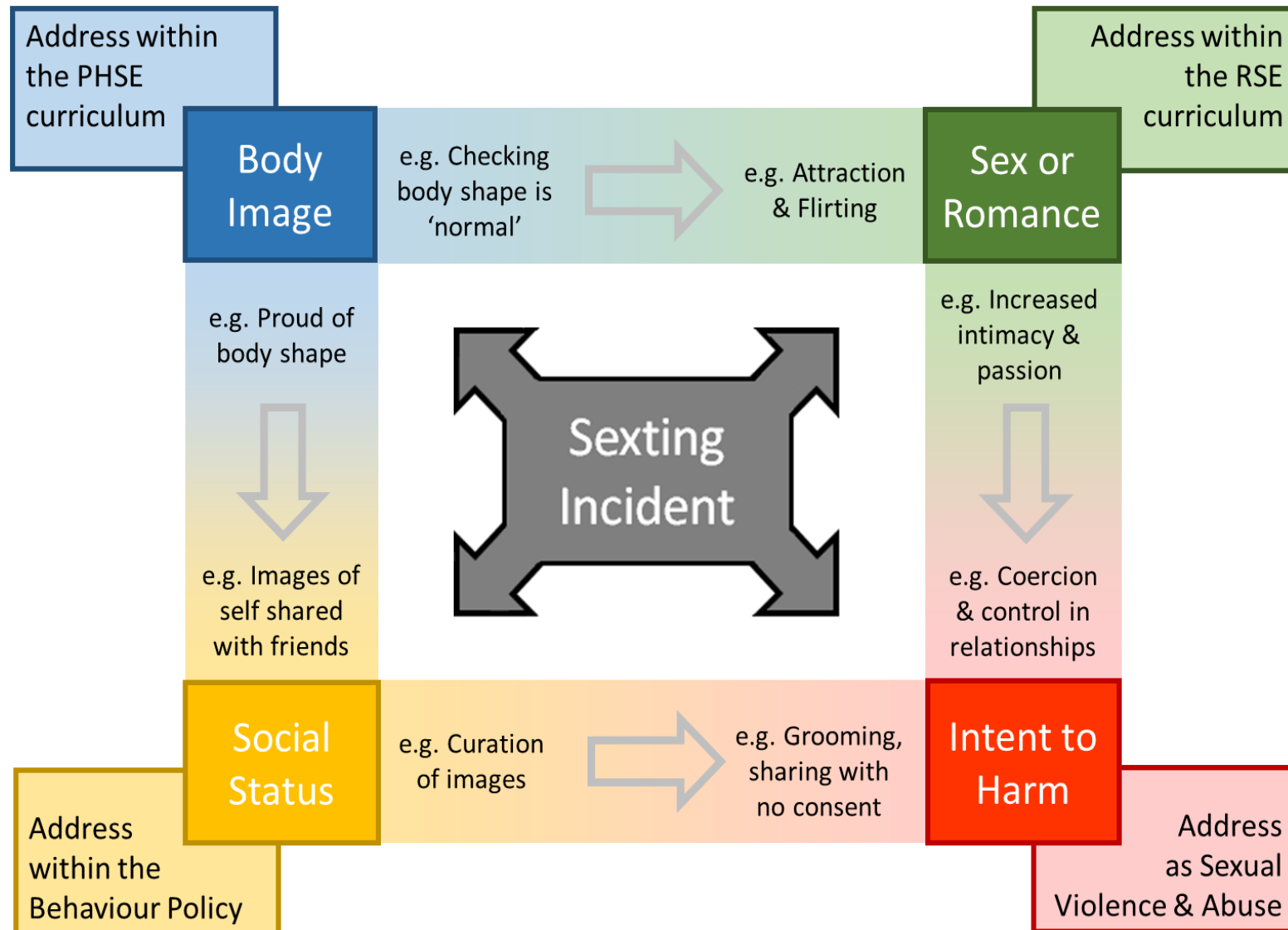
### **Category 3 – Sexual Violence**

Recorded on CPOMS as a safeguarding incident

Including but not limited to:

- Rape
- Assault by penetration
- Sexual Assault (touching in a sexual way without consent)
- Grooming for sexual/criminal exploitation

## Appendix 4 – School Response to Sexting Incidents



## **Appendix 5**

### **Recruitment and Selection Process**

The recruitment steps outlined below are based on part 3 of *Keeping Children Safe in Education* (KCSIE) 2026.

The Early Years Foundation Stage statutory framework contains its own requirements for safer recruitment:

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

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

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application Forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

### **Shortlisting**

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

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

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

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

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

### **Seeking References and Checking Employment History**

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

When seeking references we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher / principal as accurate in respect to disciplinary investigations

- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and Selection**

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

Explore any potential areas of concern to determine the candidate's suitability to work with children

Record all information considered and decisions made

### **Pre-appointment Vetting Checks**

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

### **New Staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a

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

- Obtain a separate barred list check:
  - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
  - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions:  
<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and / or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position<sup>1</sup> are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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<sup>1</sup> Management positions are most likely to include, but are not limited to, headteachers, principals and deputy / assistant headteachers

**Regulated activity** means a person who will be:

- Responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

### **Existing Staff and Volunteers**

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

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

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

- We believe:
  - the individual has engaged in relevant conduct:  
<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children>
  - the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009:  
<http://www.legislation.gov.uk/ukxi/2009/37/contents/made>
  - the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

### **Agency and Third-party Staff**

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

### **Contractors**

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

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

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

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

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

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

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

### **Trainee / Student Teachers**

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- In EYFS provision, references for volunteers are always obtained before they are recruited and ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **Trustees and Governance**

All Trustees will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

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

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008):  
<https://www.legislation.gov.uk/ukpga/2008/25/section/128>
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Staff Working in Alternative Provision Settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who Supervise Pupils on Work Experience**

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

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Appendix 6 – Allegations Against Staff Including Low Level Concerns**

### **Section 1: Allegations that may Meet the Harm Threshold**

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, 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
- Behaved towards a child or children in a way that indicates they may 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 – this includes behaviour taking place both inside and outside of school

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

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

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

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

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

### **Suspension of the Accused Until the Case is Resolved**

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned

- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents / carers have been consulted

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

### **Definitions for Outcomes of Allegation Investigations**

**Substantiated:** There is sufficient evidence to prove the allegation

**Malicious:** There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

**False:** There is sufficient evidence to disprove the allegation

**Unsubstantiated:** There is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** To reflect cases where there is no evidence or proper basis that supports the allegation being made

### **Procedure for Dealing with Allegations**

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and / or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and / or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and / or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and / or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where

this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child / children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- **If the incident is within EYFS years**, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point

### **Additional Considerations for Supply Teachers, Trainee Teachers, and All Contracted Staff**

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies

### **Timescales**

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter

### **Specific Actions**

#### **Action Following a Criminal Investigation or Prosecution**

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

#### **Conclusion of a Case where the Allegation is Substantiated**

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

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

### **Individuals Returning to Work after suspension**

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

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

### **Unsubstantiated, Unfounded, False or Malicious Reports**

If a report is:

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

### **Unsubstantiated, Unfounded, False or Malicious Allegations**

If an allegation is:

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

### **Confidentiality and Information Sharing**

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child / children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record Keeping**

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference
- In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate
- We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer

### **References**

When providing employer references, we will:

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

### **Learning Lessons**

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual
- For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### **Non-recent Allegations**

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

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

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

### **Section 2: Concerns that do not Meet the Harm Threshold**

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

Concerns may arise through, for example:

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

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

### **Definition of Low-level Concerns**

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work

- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

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

### **Sharing Low-level Concerns**

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

We will create this culture by:

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

### **Responding to Low-level Concerns**

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

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

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

## **Record Keeping**

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

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

## **References**

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

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

## **Appendix 7 – Types of Abuse**

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

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

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

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

### **Physical Abuse**

This 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**

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

Emotional abuse may involve:

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

## **Sexual Abuse**

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

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

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

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

## **Neglect**

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

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

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

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