



SAFE START SCHOOL

WILLPOWER-INITIATIVE-SUCCESS-EMPATHY-RESPECT

Safeguarding and Child Protection Policy

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Written by: Grace Speakman

Reviewed by: Kate Collins and Emily Pilling

This policy will be reviewed at least annually and earlier where there are changes to statutory guidance, legislation, local safeguarding arrangements or circumstances within the school.

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IMPORTANT CONTACTS

Designated Safeguarding Lead DSL

Emily Pilling emily.pilling@safestartschooltameside.com

Head Teacher Deputy DSL

Kate Collins head.teacher@safestartschooltameside.com

Tameside LADO

Local authority designated officer (LADO) ladoreferrals@tameside.gov.uk

07812 140 002

Proprietor

Mrs Rachel Pilling MBE director@safestartschooltameside.com

NSPCC Hotline for under 18's: 08001111
NSPCC for adults: 0808 800 5000
Anti-Terrorist CHANNEL: 0800789321

For advice from the school out-of-hours

Outside standard business hours and during holidays, you can contact the following DSL telephone numbers by calling 07427 476 543 or 0161 523 5444 and leaving a message with your details for a callback

In an emergency

If a student is in immediate danger, please take action to ensure their safety by contacting the Emergency Services

- Call 999
- Alternatively contact 101
- Tameside Children's Social Work Teams 0161 342 4101 or 0161 342 2222 (out of hours)
- GM Police Public Protection Unit 0161 8569314
- NSPCC 08088005000
- Samaritans 116 123
- <https://shorespace.org.uk/>

Local Authority	Family Help	Children's Social Work	Local Authority Designated Officer	Out of hours
Tameside	0161 342 4101 Out of hours 0161 342 2222	0161 342 4101	ladoreferrals@tameside.gov.uk 0161 342 4398 0161 342 4343, then selecting option 3	0161 342 2222

Oldham	Child.mash@oldham.gov.uk child.mash@oldham.gov.uk	0161 770 7777	Colette Morris 0161 770 8870 Wendy Nicholls: 0161 770 0008	0161 770 6936
Manchester	North 0161 234 1973 Central 0161 234 1975 South 0161 234 1977	0161 234 1973	0161 234 1214	0161 234 1973
Rochdale	0300 303 8801	early.help2@rochdale.gov.uk 0300 303 8801	lado@rochdale.gov.uk 0300 303 8801	0300 3038801
Stockport	0161 217 6028.	stockport.lado@stockport.gov.uk 0161 474 5657	0161 474 5657 stockport.lado@stockport.gov.uk	0161 4745657
Salford	0161 603 4239	Salford Bridge Partnership: 0161 603 4500 worriedaboutachild@salford.gov.uk	0161 603 4239 or 0161 603 4445 LADO@salford.gov.uk	0161 6034350

1 AIMS

Our aim is to safeguard and promote the welfare, physical and mental health and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere. This includes:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2 LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance *Keeping Children Safe in Education 2026 (KCSIE)* and *Working Together to Safeguard Children 2026*. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability-, sex, sexual

orientation, gender reassignment and race). This means the Proprietor and school leaders should carefully consider how the school supports pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children, where applicable.
- Safe Start School complies with the Independent School Standards

3 DEFINITIONS

Safeguarding and promoting the welfare of children means:

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

Child Protection

Child protection is part of this definition and refers to activities undertaken to prevent children from suffering, or being likely to suffer, significant harm.

Abuse

The term 'abuse' is often used as an umbrella term. Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

Appendix 1 explains the different types of abuse.

Neglect

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

Appendix 1 defines neglect in more detail.

Safeguarding Partners

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

- The local authority (LA)
- Integrated Care Board (ICB)
- The chief officer of police for a police area in the LA area

4 EQUALITY STATEMENT

Some children have an increased risk of abuse, 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.

At Safe Start School where barriers have been identified staff will be delegated to support those barriers through the ITHRIVE model.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see sections 10 and 11)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as a second language
- Are known to be living in difficult situations- for example, temporary accommodation where there are issues such as substance abuse or domestic violence.
- 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 (see section 15)
- Are absent from education, particularly where absence is repeated or prolonged
- Are at risk of FGM, sexual exploitation, forced marriage or radicalisation
- Whose parent/carer has expressed an intention to remove them from school to be home-educated

Safe Start School recognises that safeguarding risks and children's experiences of abuse, neglect and exploitation may be affected by their individual circumstances and characteristics. Staff will remain alert to the potential impact of discrimination, racism, sexism, misogyny, misandry, homophobia, transphobia and other prejudice-based or discriminatory behaviour.

The school recognises that children with SEND, disabilities, medical conditions or communication difficulties may experience additional barriers to recognising, reporting or being understood when experiencing abuse. Staff must not assume that changes in behaviour, mood, presentation, attendance or injury are attributable to a child's SEND, disability or medical condition without further exploration.

5 ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to the Proprietor, all staff, volunteers and members of the Governing Body. The statutory safeguarding responsibilities of the school rest with the Proprietor, as set out in section 5.3.

5.1 All staff

All staff will read and understand Part One of Keeping Children Safe in Education 2026.

School leaders and staff who work directly with children will also read Annex A of KCSIE 2026.

All staff will confirm at least annually that they have read and understood the relevant sections of KCSIE.

Staff will receive safeguarding and child protection training, including online safety and their responsibilities in relation to filtering and monitoring, at induction. Training will be regularly updated and safeguarding updates will be provided as required and at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies
- The behaviour policy, E-Safety policy and the safeguarding response to children who are absent from education
- The arrangements for universal services and community-based early help, targeted Family Help and statutory children's social care intervention, including the thresholds and local referral processes.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- Section 18 and appendix 4 of this policy outline in more detail how staff are supported to do this.
- Their filtering and monitoring responsibilities

All staff must understand that safeguarding concerns may arise from behaviour observed both inside and outside of school, including online activity. Any such concerns must be reported in line with this policy.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Emily Pilling. The DSL takes lead responsibility for child protection and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, Kate Collins (Headteacher and Deputy DSL), will act as cover.

Safe Start School will maintain robust arrangements to ensure appropriate DSL or deputy DSL cover during school hours. Safeguarding action must not be delayed because the DSL is unavailable.

Where the DSL or a deputy is exceptionally unavailable, staff should speak to a member of the senior leadership team and/or seek advice directly from local authority children's social care. Any action taken must be shared with the DSL or deputy as soon as practically possible.

Safeguarding communications and information will be managed through secure arrangements that do not rely upon access to one individual member of staff.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The Proprietor

The Proprietor has overall responsibility for ensuring that Safe Start School complies with its statutory safeguarding and child protection responsibilities and that safeguarding arrangements meet the requirements of *Keeping Children Safe in Education*, the Independent School Standards and other relevant legislation and statutory guidance.

The Proprietor will:

- Ensure that the school has effective safeguarding policies, procedures and systems in place and that these are implemented effectively.
- Ensure that safeguarding and child protection are at the forefront of the school's arrangements and underpin relevant aspects of policy and practice.
- Ensure that this Safeguarding and Child Protection Policy is reviewed at least annually, and earlier where required, and approve the policy following each review.

- Ensure that the school has an appropriate senior member of staff appointed as the Designated Safeguarding Lead (DSL), with appropriate status, authority, time, funding, training, resources and support to fulfil the role.
- Ensure that appropriate deputy DSL arrangements are in place.
- Ensure that the DSL and any deputies receive appropriate safeguarding training and that their knowledge and skills are updated as required.
- Ensure that all staff receive appropriate safeguarding and child protection training, including online safety and their responsibilities in relation to filtering and monitoring.
- Ensure that appropriate safeguarding arrangements are in place for children who may be particularly vulnerable, including children with SEND.
- Ensure that the school has appropriate procedures for responding to child-on-child abuse, sexual violence and sexual harassment, online safeguarding concerns and other forms of abuse, neglect and exploitation.
- Ensure that appropriate filtering and monitoring systems are in place and that their effectiveness is reviewed at least annually.
- Ensure that safer recruitment procedures are followed and that the school maintains the required Single Central Record.
- Ensure that appropriate arrangements are in place for managing safeguarding concerns and allegations about adults working in or on behalf of the school, including low-level concerns.
- Act as the case manager where a safeguarding concern or allegation is made about the Headteacher, in accordance with Appendix 3 and KCSIE.
- Liaise with the Local Authority Designated Officer (LADO) where required.
- Ensure that the school works effectively with local safeguarding partners and other agencies.
- Ensure that safeguarding arrangements are monitored and that any identified weaknesses or deficiencies are remedied without delay.
- Receive appropriate safeguarding training to enable the Proprietor to understand and discharge their safeguarding responsibilities effectively.

5.4 The Governing Body

Safe Start School has established a Governing Body as part of its internal governance arrangements.

The Governing Body has an advisory and supportive role and does not assume the statutory safeguarding responsibilities of the Proprietor. Responsibility for ensuring compliance with the Independent School Standards and the school's statutory safeguarding duties remains with the Proprietor.

The Governing Body may receive safeguarding information and provide challenge, scrutiny and advice to school leaders and the Proprietor as part of the school's internal quality-assurance arrangements. It does not replace the Proprietor's decision-making, accountability or statutory responsibilities.

Governors will report any safeguarding concerns arising through their role immediately to the DSL, Headteacher or Proprietor, as appropriate, in accordance with this policy.

5.5 The Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Ensuring that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly

6 CONFIDENTIALITY AND INFORMATION SHARING

At Safe Start School safeguarding information is stored through our safeguarding software CPOMS. All staff are provided with secure log-ins and training on protocols of the system.

It is vital that our practices include:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, do not prevent or limit appropriate information sharing for the purposes of safeguarding children.
- Where special category personal data needs to be shared, the Data Protection Act 2018 provides relevant conditions which may permit information to be shared for safeguarding purposes without consent where the applicable legal requirements are met.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

- The Government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 17, and allegations concerning adults working in or on behalf of the school in Appendix 3.

Safeguarding children requires effective information sharing between professionals and agencies.

Data protection legislation does not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

Staff must not allow concerns about data protection or confidentiality to prevent necessary safeguarding information from being shared.

Information shared for safeguarding purposes should be necessary, proportionate, relevant, adequate, accurate, timely and secure.

Where there is uncertainty about whether information should be shared, staff should seek advice from the DSL or deputy DSL. However, this must not result in unnecessary delay where a child may be at risk.

The school will record significant decisions about information sharing, including the reasons for sharing or, where relevant, the reasons for deciding not to share information.

7 RECOGNISING ABUSE AND TAKING ACTION

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

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

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

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

Tell the DSL as soon as possible if you make a referral directly.

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

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgment on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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

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

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

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

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

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

Figure 1 below illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

7.5 Universal Services, Community-Based Early Help and Family Help

Safe Start School recognises the importance of providing children and families with help and support as soon as problems emerge.

Staff should be aware of local arrangements for universal services and community-based early help and targeted early help delivered through **Family Help**.

Where a child does not require statutory children's social care intervention, the DSL or deputy will generally lead liaison with other agencies and support an inter-agency assessment where appropriate. Other staff may be required to contribute to assessments or act as lead practitioner where appropriate.

Family Help and other support arrangements will be kept under regular review. Where a child's circumstances do not improve, needs increase or safeguarding concerns escalate, consideration must be given to referral to local authority children's social care.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to children's social care and, where appropriate, the police must be made immediately.

Safe Start School will follow the published local safeguarding partnership thresholds, assessment protocols and referral arrangements.

7.6 If you have concerns about extremism

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

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

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

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

Tameside PREVENT -prevent@tameside.gov.uk

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

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

7.7 Mental Health

Mental health difficulties can, in some circumstances, indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to changes in a child's behaviour, presentation, attendance, relationships, emotional wellbeing or engagement with learning which may indicate that the child is experiencing mental health difficulties or may be at risk of developing them.

Staff are not expected to diagnose mental health conditions. Where a member of staff has a mental health concern about a child that is also a safeguarding concern, they must take immediate action in accordance with section 7.4 of this policy and report the concern to the DSL or deputy DSL.

Where a mental health concern does not appear to be a safeguarding concern, staff should still share the concern with the DSL or appropriate pastoral lead so that suitable support can be considered.

Safe Start School recognises that mental health, safeguarding, trauma, SEND, attendance and behaviour can be closely connected. Staff will therefore consider these factors together rather than viewing them in isolation.

The school will take a child-centred and developmentally appropriate approach and will take account of the child's wishes and feelings, communication needs, SEND, family circumstances and any known involvement of other agencies.

Where appropriate, the DSL will consider whether support is required from internal pastoral services, health professionals, Family Help, local authority children's social care or other relevant agencies.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to local authority children's social care and, where appropriate, the police will be made immediately.

Actions where there are concerns about a child

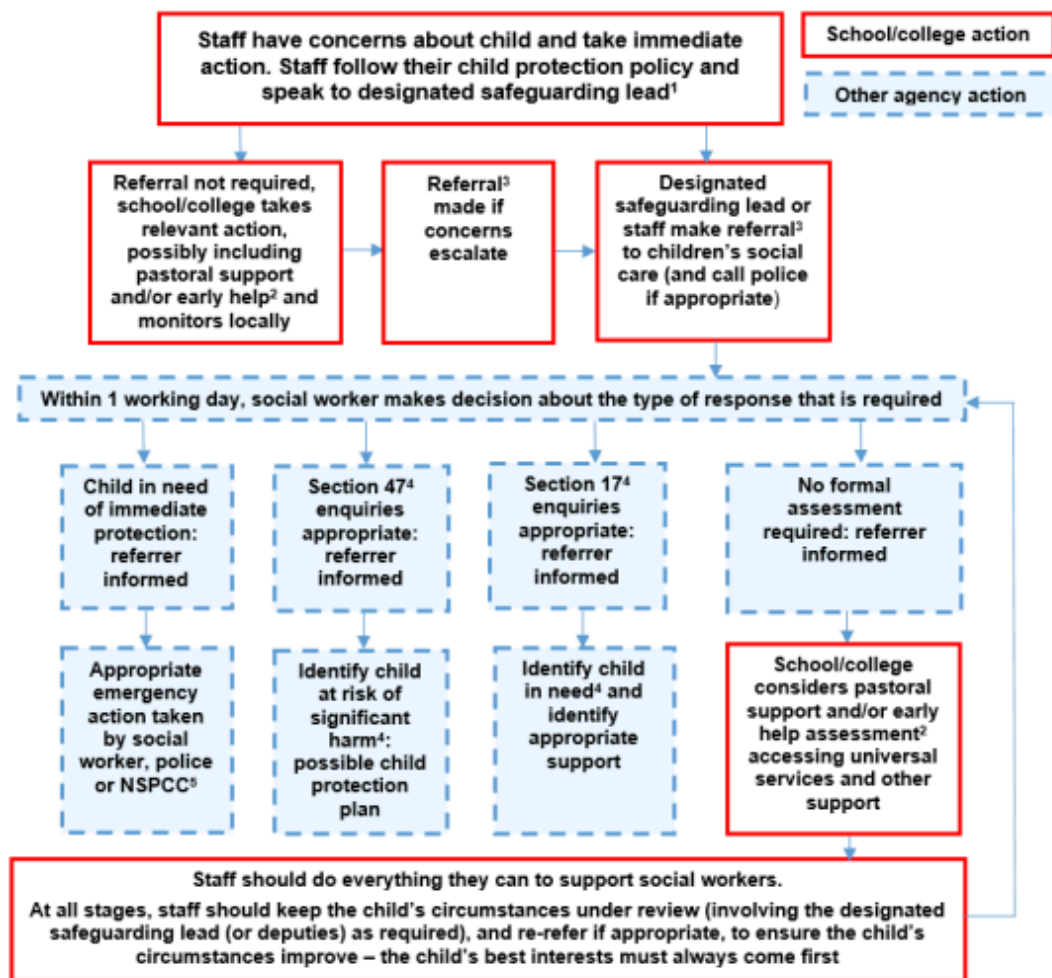


Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

7.8 Children who are questioning their gender

Safe Start School recognises that children who are questioning their gender may require sensitive and thoughtful support from the school. The safeguarding, welfare and best interests of the child will be central to the school's response.

Children who are questioning their gender are not a homogeneous group and their individual circumstances, experiences and needs will differ. The school will therefore consider each child individually and will not adopt a one-size-fits-all approach.

A child questioning their gender is not, in itself, a safeguarding concern. However, staff should remain professionally curious and alert to any wider needs or vulnerabilities which may be present. These may include mental health difficulties,

SEND or communication needs, bullying or discrimination, family or peer relationship difficulties, abuse, neglect, exploitation or other safeguarding concerns.

Staff should provide children with appropriate opportunities to express their wishes and feelings without making assumptions about the child's identity or the outcome of any questioning. Staff are not expected to diagnose or provide clinical advice.

The school will maintain an environment in which all pupils are treated with dignity and respect. Bullying, harassment and discriminatory behaviour, including homophobic, biphobic or transphobic bullying, will not be tolerated and will be addressed in accordance with the school's safeguarding and behaviour procedures.

Requests relating to social transition

Where a child or their parent/carer makes a request concerning an aspect of social transition, the school will consider the request carefully and on an individual basis.

This may include requests relating to a child's name, pronouns, uniform or other aspects of school life.

When considering such a request, the child's best interests, safeguarding and wellbeing will be central to the decision. The school will consider relevant factors including:

- the child's age and developmental stage;
- the child's wishes and feelings;
- SEND, cognitive ability and communication needs;
- the child's wider circumstances and any known safeguarding concerns;
- the views of parents/carers;
- the potential impact upon the child and other pupils; and
- any relevant clinical advice that the child or family has received.

The school will take a particularly cautious approach when considering social transition for pre-pubertal children and will have regard to any available clinical advice.

Staff must not independently agree to or implement significant changes relating to social transition. Requests should be referred to the Headteacher and/or DSL so that they can be considered consistently, appropriately and in accordance with the school's safeguarding responsibilities.

Parents and carers

Safe Start School recognises the important role of parents and carers in safeguarding and supporting their children.

Where a child raises questions about their gender or makes a request relating to social transition, the school will seek the views and involvement of parents/carers wherever possible.

Staff should not promise a child that information concerning such a request will automatically be kept confidential from their parents/carers.

Where there is a genuine safeguarding reason to believe that involving a parent/carer may place the child at risk of harm, the matter must be referred to the DSL. The DSL will determine the appropriate course of action in accordance with this safeguarding policy and, where necessary, seek advice from children's social care or other relevant professionals.

Where the child or family has received relevant clinical advice, the school will take this into consideration when determining how best to support the child.

Safeguarding concerns

Any safeguarding concern identified in relation to a child who is questioning their gender must be responded to in the same way as any other safeguarding concern.

Staff must report concerns to the DSL or deputy DSL and follow the procedures set out within this policy.

The school will consider the child's circumstances as a whole and will not assume that changes in behaviour, mental health, attendance, relationships or engagement with education are necessarily attributable to the child questioning their gender.

Significant discussions, safeguarding considerations, requests, decisions and the reasons for those decisions will be appropriately recorded and, where necessary, reviewed as the child's circumstances change.

Toilets, changing facilities and sport

Safe Start School provides individual, self-contained toilet facilities rather than communal or shared toilets. This provides privacy for all pupils. The school does not have communal changing rooms or other changing facilities.

Sporting and physical activities at Safe Start School are not ordinarily organised or separated according to sex or gender. Pupils participate together where this is appropriate to the activity.

Where an individual safeguarding, privacy, accessibility or welfare issue arises in relation to facilities or participation in an activity, the school will consider the circumstances of the individual child and any other pupils affected and will undertake an appropriate risk assessment where necessary.

The school's approach will seek to safeguard and promote the welfare of the individual child while also having appropriate regard to the safeguarding, privacy, dignity and welfare of all pupils.

7.8 Concerns or allegations about staff, supply teachers, trainee teachers, volunteers and contractors

This includes concerns that do not meet the harm threshold ("low-level concerns"). All low-level concerns must be reported, recorded, and managed in accordance with Appendix 3 of this policy.

If you have a safeguarding concern or allegation about a member of staff, supply teacher, trainee teacher, volunteer or contractor, report it to the Headteacher as soon as possible.

If the concern or allegation is about the Headteacher, report it without delay to the Proprietor.

Where there is a conflict of interest in reporting to the Headteacher, contact the LADO directly.

The Headteacher or Proprietor, as appropriate, will follow Appendix 3.

7.9 Child-on-child abuse (including harassment and violence)

Safe Start School recognises that children can abuse other children and that this can occur inside or outside school and online.

All staff will maintain an attitude of "it could happen here".

Child-on-child abuse is a safeguarding concern for both the child who has experienced harm and the child alleged to have caused harm. It is preventable and will never be dismissed as "banter", "having a laugh", "part of growing up" or similar.

The absence of reported incidents does not mean that child-on-child abuse is not occurring. Staff should remain alert to barriers which may prevent children from reporting abuse.

Child-on-child abuse may include:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- physical abuse;
- abuse within intimate personal relationships;
- sexual violence and sexual harassment;
- harmful sexual behaviour;
- consensual and non-consensual sharing of nudes and semi-nudes;
- upskirting;
- initiation/hazing-type violence and rituals;
- serious violence and threats involving weapons;
- misogynistic or discriminatory behaviour; and
- abuse facilitated through technology.

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

Harmful Sexual Behaviour (HSB)

Sexual behaviour between children exists on a continuum ranging from developmentally expected behaviour through to inappropriate, problematic, abusive or violent behaviour.

Safe Start School will consider HSB within a child protection context. Assessments will take account of the age and developmental stage of the children involved, SEND and cognitive ability, communication needs, power imbalance, coercion, exploitation, vulnerability, frequency, intent and impact.

Staff will recognise that children who display HSB may themselves have experienced abuse, neglect, exploitation or trauma and may require safeguarding and therapeutic support.

The school recognises that inappropriate behaviour, including misogyny, can escalate and that early identification and intervention can reduce the risk of progression to sexual harassment and sexual violence.

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will undertake an immediate safeguarding assessment and consider the needs and risks relating to all children involved. The DSL will consider whether referral to children's social care and/or the police is required, having regard to the nature and severity of the allegation, the ages and developmental stages of the

children, SEND, coercion, power imbalance, previous concerns and the risk of further harm.

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will consider whether either or any of the children involved require additional pastoral, therapeutic or mental-health support and will make appropriate referrals where required.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.11 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report

- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

7.10 Making and sharing nudes and semi-nudes

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the sharing is consensual or non-consensual.

The school's response will be proportionate and take account of the age, developmental stage and circumstances of the children involved and any evidence of coercion, exploitation, power imbalance or vulnerability.

You must not:

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 17 of this policy also apply to recording these incidents.

Curriculum coverage

At Safe Start School our designated PSHE tutor alongside external professionals will aim to support students regarding Relationships and Sex Education.

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
 - Specific requests or pressure to provide (or forward) such images
 - The receipt of such images

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

7.11 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Attendance

We recognise that school attendance is a significant safeguarding factor. Regular attendance is not only a legal requirement but a protective factor for children. We acknowledge that persistent absence (PA) or severe absence (SA) can be a primary indicator of underlying safeguarding concerns, including but not limited to:

- Physical, emotional, or sexual abuse;
- Neglect (including medical or educational neglect);
- Criminal or sexual exploitation;
- Unidentified Special Educational Needs and Disabilities (SEND) or mental health difficulties;
- Domestic abuse within the home.

Identifying Risks through Absence

The Designated Safeguarding Lead (DSL) and the Attendance Officer will meet weekly to review attendance data. We categorise absence as a potential safeguarding risk when:

- **Persistent Absence (Below 90%):** We will investigate the root causes of the absence, looking beyond illness to identify any underlying barriers or safeguarding risks, including risks within or outside the home.
- **Severe Absence (below 50%):** These cases will receive enhanced safeguarding scrutiny. The DSL and Attendance Officer will consider whether the pattern or circumstances indicate abuse, neglect, exploitation or another safeguarding concern and whether multi-agency involvement is required.

- **Irregular Patterns:** Sudden drops in attendance or frequent absences on specific days (e.g., Fridays or Mondays) will be flagged for investigation.

Response and Intervention

In accordance with the statutory guidance *Working Together to Improve School Attendance*, our response will be "support-first." However, where absence is linked to safeguarding:

- **Home Visits:** Where contact cannot be established, the school will consider a home visit or other appropriate welfare action in accordance with the pupil's known circumstances, risk assessment and Attendance Policy.
- **Escalation:** Where attendance does not improve through internal support, or where there are indicators of neglect or harm, a referral will be made to local authority children's social care, Family Help or another appropriate service, in accordance with local arrangements.
- **Children absent from education:** Repeated and/or prolonged absence will be treated as a potential safeguarding indicator. The school will make reasonable enquiries, follow its Attendance Policy and relevant local authority procedures, and make appropriate referrals where a child's whereabouts, welfare or access to education cannot be established.

Alternative Provision (AP):

For any pupil attending off-site AP, the school remains responsible for their safeguarding. We will verify attendance with the provider daily. If a pupil fails to attend AP, our standard safeguarding absence protocols will be triggered immediately.

Staff Responsibility

All staff are trained to recognise that a child's attendance is a key part of their "professional curiosity." Any concerns regarding a pupil's absence pattern must be recorded on CPOMS and reported to the DSL.

8. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

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

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories.
- Contact – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Filtering and Monitoring Governance

The Proprietor has overall responsibility for ensuring that appropriate filtering and monitoring systems are in place and that their effectiveness is reviewed at least annually. The senior leadership team, DSL and IT partner are responsible for the operational implementation and ongoing oversight of these arrangements.

The Designated Safeguarding Lead (DSL) works in partnership with the school's IT partner to:

- Understand how filtering and monitoring systems operate
- Ensure safeguarding concerns identified through monitoring are responded to promptly
- Escalate concerns where systems are ineffective or safeguarding risks are identified

The effectiveness of filtering and monitoring systems will be reviewed at least annually and whenever there is a significant safeguarding concern.

Artificial Intelligence (AI) and Digital Safety

Oversight and Safe Use

We recognise that Generative Artificial Intelligence (AI) provides significant educational opportunities but also introduces specific safeguarding risks. In line with **KCSIE 2026**, the school treats the use of AI as an online safety priority.

Identifying and Mitigating AI Risks

The Designated Safeguarding Lead (DSL) and IT Partner will work together to monitor and mitigate AI-related risks, such as:

- **Deepfakes and Image Generation:** The use of AI to create non-consensual, sexually explicit, or harmful "deepfake" imagery or videos of pupils or staff is strictly prohibited. This will be treated as a serious safeguarding breach.
- **Harmful Content:** AI tools can sometimes bypass standard filters to generate biased, extremist, or age-inappropriate content. Staff should be trained to supervise pupil AI interactions closely.
- **Data Privacy:** Personal, special-category, safeguarding or otherwise confidential information must not be entered into generative AI systems unless the specific system and use have been approved by the school in accordance with its data-protection and information-security procedures.

Filtering and Monitoring

The school's filtering and monitoring arrangements will be configured, so far as technically appropriate, to manage access to unauthorised or high-risk AI services.

The effectiveness of the school's filtering and monitoring arrangements will be formally reviewed **at least once every academic year** by the member of SLT responsible for filtering and monitoring, with support from the DSL and appropriate IT support.

The review will include checks that filtering and monitoring operate appropriately across internet-connected devices and relevant locations. A record of these checks and any resulting actions will be maintained.

Mobile Phones and Personal Devices

The school recognises that mobile phones and other personal connected devices can create safeguarding risks. Their use will be managed in accordance with the school's Mobile Phone and Acceptable Use Policies. Staff must not use personal devices to photograph or record pupils and pupils' access to personal devices during the school day will be managed in accordance with school procedures. Any safeguarding concern involving a personal device will be reported to the DSL.

Educating Pupils and Staff

- **Critical Thinking:** Pupils are taught to critically evaluate AI-generated information as part of the RSHE/PSHE curriculum. Pupils should recognise

that AI can produce "hallucinations" (factually incorrect data), misinformation, or biased perspectives.

Acceptable Use: All pupils and staff must adhere to the **Acceptable Use Policy (AUP)** regarding AI. Misuse of AI for harassment, academic dishonesty, or the creation of harmful content will result in disciplinary action.

Statutory Guidance & Resources

For further information on the safe implementation of these technologies, staff should refer to:

- The DfE's Generative AI in Education policy paper.
- The [Plan Technology for Your School](#) service for technical configuration standards.
- The UK Council for Internet Safety (UKCIS) guidance on emerging technologies.

9. NOTIFYING PARENTS OR CARERS

Safe Start School recognises parents and carers as important partners in safeguarding children and will seek to work openly, respectfully and collaboratively with families wherever this is consistent with the child's welfare.

Communication will be clear, accessible and adapted where necessary to meet the communication needs of children and families.

Parents/carers will ordinarily be informed about safeguarding concerns and proposed support unless doing so may place the child or another person at increased risk of harm, impede a police or social care investigation or otherwise be contrary to the child's best interests.

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

10. Children with Special Educational Needs and Disabilities

Safe Start School recognises that children with SEND can face additional safeguarding challenges both online and offline.

Staff will be alert to additional barriers to identifying abuse, neglect and exploitation, including:

- assumptions that behaviour, mood, injury or changes in presentation relate to the child's SEND without further exploration;
- communication difficulties or differences which may make disclosure more difficult;
- increased dependence upon adults;
- greater risk of isolation or bullying, including prejudice-based bullying;
- difficulties recognising unsafe situations or relationships;
- children being disproportionately affected by bullying or abuse without outwardly showing signs; and
- difficulties in reporting, understanding or being believed when describing experiences.

We offer extra pastoral support for these pupils.

This includes:

- 1:1 pastoral support
- Individual Education Plan
- Key mentors and tutors
- External agency support

11. Safeguarding Children with Medical Conditions

A medical incident does not automatically constitute a safeguarding concern. However, staff should consider safeguarding where a child's medical condition appears to increase their vulnerability to abuse, neglect or exploitation.

Concerns may arise, for example, where important medical information is repeatedly withheld from school or where a child repeatedly attends without essential medication in circumstances which place them at risk.

Any such concerns will be discussed with the DSL and considered under the school's normal safeguarding procedures.

12. Young Carers

Safe Start School will be alert to children who have caring responsibilities for a family member. The school recognises that caring responsibilities can affect a child's attendance, attainment, behaviour and wellbeing.

Early identification is important. Where a pupil is identified as a young carer, the school will consider appropriate internal support and, where required, support from Family Help, the local authority, health services or other relevant agencies.

13. Safeguarding Pupils Attending Alternative Provision

Where Safe Start School commissions alternative provision for a pupil, **the school retains responsibility for safeguarding that pupil.**

Before a placement begins, Safe Start will undertake appropriate due diligence and obtain written confirmation that relevant safeguarding checks have been completed on individuals working within the provision.

Providers will be required to inform Safe Start of changes to arrangements that could affect the safeguarding of the pupil, including relevant staffing changes.

Safe Start will know where the pupil is based during school hours, including the addresses of alternative provision, subcontracted provision and satellite sites.

Alternative provision placements will be reviewed **at least half-termly** to provide assurance that the pupil is attending, remains safe and that the placement continues to meet their needs.

Where safeguarding concerns arise, the placement will be reviewed immediately and may be terminated unless or until those concerns have been satisfactorily addressed.

14 PUPILS WITH A SOCIAL WORKER

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

15 LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN

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

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

As part of their role, the designated teacher will:

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

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

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

We have appointed an appropriately trained designated teacher to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

16. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

16.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

16.2 Whistleblowing

Safe Start School promotes a culture in which staff are able to raise concerns about poor or unsafe safeguarding practice and potential failures in the school's safeguarding arrangements.

Staff should raise concerns in accordance with the school's Whistleblowing Policy and Staff Code of Conduct.

Where a member of staff feels unable to raise a concern internally, or believes that a concern raised internally has not been addressed, they may use appropriate external whistleblowing routes, including the NSPCC Whistleblowing Advice Line where applicable.

No member of staff will be subjected to detrimental treatment for raising a genuine safeguarding concern in good faith.

17. RECORD KEEPING

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. This includes records relating to low-level concerns, which are retained securely and reviewed to identify potential patterns of behaviour.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome Concerns and referrals will be kept in a separate child protection file for each child.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

18. TRAINING

18.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

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

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

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

Volunteers will receive appropriate training, if applicable.

18.2 The DSL

The DSL and any deputies will undertake formal child protection and safeguarding training at least every two years and will receive safeguarding updates at least annually.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

18.3 Proprietor

The proprietor will receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Safeguarding training for the proprietor will be refreshed at least annually.

18.4 Staff who have contact with pupils and families

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

18.5 Governors

All governors will receive safeguarding training on appointment and refresher training at least annually.

19. MONITORING ARRANGEMENTS

This policy will be reviewed at least annually by Grace Speakman or Rachel Pilling, and earlier where required by changes to statutory guidance, legislation, local

safeguarding arrangements or the circumstances of the school. Following each review, the policy will be approved by the Proprietor. The Governing Body may provide scrutiny, challenge and advice as part of the school's internal quality-assurance arrangements.

20. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Health and Safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Privacy notices

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

Appendix 1: types of abuse

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

Physical Abuse

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

Emotional Abuse

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

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual Abuse

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

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

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

Neglect

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child on child abuse

All staff must be alert to possible indicators of safeguarding concerns which may indicate child on child abuse. This is most likely to include, but may not be limited to:

- Bullying including cyber bullying

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sharing of nudes/semi nudes imagery/videos, previously referred to as 'sexting'
- initiation/hazing type violence and rituals
- upskirting

Modern slavery

Where staff identify indicators that a child may be a victim of modern slavery or trafficking, child protection procedures will be followed and consideration given to the appropriate National Referral Mechanism arrangements.

Appendix 2: Safer Recruitment and Pre-Appointment Checks

Purpose

Safe Start School is committed to safeguarding and promoting the welfare of children. Safer recruitment forms an essential part of the school's whole-school safeguarding arrangements and is intended to deter, identify and prevent people who may be unsuitable to work with children from obtaining employment or volunteering opportunities within the school.

The school will comply with the requirements and principles set out in Keeping Children Safe in Education 2026 (KCSIE), Part Three, the Education (Independent School Standards) Regulations 2014 and other relevant legislation and statutory guidance.

Those involved in recruitment and selection will receive appropriate safer recruitment training. The substance of this training will cover, as a minimum, the relevant requirements of Part Three of KCSIE 2026. KCSIE states that proprietors should have robust recruitment procedures which deter and prevent unsuitable people from obtaining employment or volunteering opportunities.

Recruitment and selection

Job descriptions and person specifications

Before advertising a position, the school will consider:

- the skills, qualifications, experience, attitudes and behaviours required for the role;
- the safeguarding responsibilities associated with the position;
- the extent to which the role involves contact with children; and
- whether the role involves regulated activity relating to children.

Advertising

All advertisements will make clear:

- Safe Start School's commitment to safeguarding and promoting the welfare of children;
- that appropriate safeguarding and pre-employment checks will be undertaken;
- the safeguarding responsibilities of the role; and
- whether the position is exempt from the Rehabilitation of Offenders Act 1974.

Where applicable, applicants will be informed that certain roles are subject to the Rehabilitation of Offenders Act 1974 (Exceptions) Order and that disclosure requirements will be applied in accordance with current legislation and Ministry of Justice guidance.

These are expressly identified within KCSIE 2026 as information that should be included within recruitment material.

Application forms

Safe Start School will use an application form for recruitment.

A curriculum vitae will not be accepted as a substitute for a completed application form, although a CV may be submitted alongside the application form.

Applicants will normally be required to provide:

- personal details, including current and former names;
- current address;
- National Insurance number where applicable;
- present or most recent employment and the reason for leaving;
- a full employment history since leaving school, including employment, education and voluntary work;
- explanations for gaps in employment;
- relevant qualifications, awarding organisations and dates;
- details of appropriate referees; and

- information demonstrating their suitability for the role and how they meet the person specification.

Where the post involves regulated activity relating to children, recruitment information will state that it is an offence for a person who is barred from regulated activity relating to children to apply for the role.

Applicants will be provided with, or directed to, the school's Safeguarding and Child Protection Policy and policy on the recruitment of ex-offenders.

The school ensures that a CV alone does not provide adequate information and should only be accepted alongside an application form.

Shortlisting

Shortlisting will normally be undertaken by at least two people.

The shortlisting panel will:

- scrutinise applications for inconsistencies;
- identify gaps in employment or education;
- consider frequent or unexplained changes in employment or location;
- identify information requiring further clarification; and
- consider whether any aspect of the application raises a safeguarding or suitability concern.

Shortlisted candidates will be asked to complete a self-declaration concerning relevant criminal records and other information which may affect their suitability to work with children.

Subject to the applicable legal rules on disclosure, this may include whether the candidate:

- has a relevant criminal history;
- is included on the children's barred list;
- is prohibited from teaching;
- is prohibited from participating in the management of an independent school;
- is known to police or children's social care where relevant;
- is subject to relevant childcare disqualification arrangements;
- has committed relevant criminal offences outside the UK; or
- has other relevant overseas information.

Candidates will be required to confirm that the information they have supplied is true.

The purpose of the self-declaration is to enable relevant matters to be discussed with the candidate at interview before receipt of the DBS certificate.

Online searches

As part of its recruitment due diligence, Safe Start School may carry out an online search on shortlisted candidates.

The purpose of an online search is to identify publicly available information which may need to be explored with the candidate at interview because it could affect their suitability to work with children.

The school will not use online searches indiscriminately. Any information considered will be relevant and proportionate to the safeguarding purpose of the search.

Relevant concerns arising from an online search will be discussed with the candidate and decisions will be appropriately recorded.

References and employment history

Where practicable, references will be obtained before interview so that any concerns can be explored with the referee and candidate.

Safe Start School will:

- not accept open references or testimonials;
- obtain references directly from the referee;
- verify information with the referee where necessary;
- seek a reference from the candidate's current employer;
- ensure that references are provided by an appropriately senior person;
- where the referee is school based, seek appropriate confirmation of relevant disciplinary information;
- obtain verification of the candidate's most recent relevant employment where they are not currently employed;
- where a candidate is not currently working with children, seek a reference from the employer from the last time they worked with children where appropriate;
- compare references with information provided on the application form;
- investigate discrepancies or concerns; and
- resolve concerns before confirming an appointment.

Where a candidate has worked overseas, overseas employment and references will be considered alongside any additional overseas checks.

Interview and selection

The interview process will assess both the candidate's competence for the position and their suitability to work with children.

Interviewers will:

- explore gaps and inconsistencies in employment history;
- question reasons for changes of employment where appropriate;
- explore safeguarding-related information contained in the application, self-declaration, references or online search;
- consider the candidate's attitudes, motivations and approach to safeguarding;
- investigate any concern about suitability to work with children; and
- record significant information considered and the rationale for recruitment decisions.

Recruitment decisions will be made on the basis of all available information rather than any single check.

Pre-appointment checks

All offers of employment will be conditional upon satisfactory completion of the appropriate pre-employment checks.

For successful candidates, Safe Start School will, as applicable:

- verify identity, including previous names where relevant;
- obtain the appropriate enhanced DBS certificate;
- obtain children's barred list information where the individual will engage in regulated activity;
- verify the candidate's mental and physical fitness to undertake the responsibilities of the role;
- verify the right to work in the UK;
- verify professional qualifications where appropriate;
- check whether a teacher is subject to a prohibition from teaching;
- use the DfE's Check a teacher's record service where appropriate to verify professional status;
- undertake a section 128 check where an individual will take part in the management of the independent school and the check is required;
- make any additional checks considered appropriate where the individual has lived or worked outside the UK; and
- ensure any applicable childcare disqualification requirements are satisfied.

Disclosure and Barring Service checks

Most staff working at Safe Start School will be engaged in regulated activity and will therefore require an enhanced DBS check including children's barred list information.

For individuals who have the opportunity for regular contact with children but whose role does not constitute regulated activity, an enhanced DBS check without children's barred list information may be appropriate.

Children's barred list information must only be requested where the individual is engaging, or seeking to engage, in regulated activity.

The successful candidate will be required to show the school the original DBS certificate where required.

Where information is disclosed, the school will consider it fairly and on an individual basis, having regard to matters including:

- the nature and seriousness of the offence;
- its relevance to the role;
- how long ago it occurred;
- whether it was an isolated incident or formed part of a pattern;
- the circumstances surrounding it;
- the candidate's explanation; and
- whether the individual accepted responsibility.

A conviction or caution will not automatically prevent employment unless the individual is legally barred or otherwise prohibited from carrying out the role.

Any decision not to appoint because of criminal-record information will be appropriately documented.

Starting employment before receipt of a DBS certificate

Where permitted by law, Safe Start School may exceptionally allow an individual to begin work before receipt of the enhanced DBS certificate.

Before doing so:

- all other relevant pre-employment checks must have been completed;
- a separate children's barred list check must have been completed where the individual will engage in regulated activity;
- an appropriate written risk assessment will be undertaken;
- appropriate supervision will be put in place; and
- the decision and rationale will be recorded.

This will only be used exceptionally and where the school is satisfied that safeguarding arrangements are sufficient.

DBS Update Service

Where an applicant is subscribed to the DBS Update Service, Safe Start School may carry out a status check where the certificate is at the appropriate level and for the relevant workforce.

The school will still inspect the original DBS certificate before relying upon an Update Service check.

Individuals may join the Update Service when applying for a DBS check or within 30 calendar days of the certificate's issue date.

Regulated activity

The full legal definition of regulated activity is contained in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended, including by the Crime and Policing Act 2026.

For the purposes of this policy, regulated activity may include work or volunteering involving:

- teaching;
- training;
- instructing;
- caring for or supervising children;
- providing advice or guidance relating to children's physical, emotional or educational wellbeing;
- driving a vehicle provided only for children; or
- other work in specified establishments, including schools, which provides an opportunity for contact with children,

where the relevant frequency or period conditions are met.

Activities may also be regulated activity regardless of frequency where they involve:

- relevant personal care;
- healthcare provided by, or under the direction or supervision of, a regulated healthcare professional; or
- relevant overnight activity.

Where a volunteer undertakes teaching, training, instructing or supervising children frequently, on more than three days within a 30-day period, or overnight, the individual will now be in regulated activity and an enhanced DBS check with children's barred list information will be obtained.

Existing staff

Safe Start School may carry out further safeguarding checks on an existing member of staff where appropriate.

This may include circumstances where:

- concerns arise about the person's suitability to work with children;
- the individual's duties change so that they begin engaging in regulated activity; or
- other circumstances mean additional checks are required under KCSIE or applicable legislation.

Safeguarding is an ongoing responsibility and recruitment checks do not remove the need to respond to concerns arising during employment.

Where the statutory conditions for a DBS referral are met, the school will make a referral to the Disclosure and Barring Service.

This includes circumstances where an individual has been removed from regulated activity, or would have been removed had they not resigned or otherwise left, and the relevant harm/referral criteria are met.

Agency and third-party staff

Before an agency or third-party worker starts work at Safe Start School, the school will obtain written confirmation from the supplying organisation that it has completed the safeguarding checks the school would otherwise be required to carry out.

Where regulated activity is involved, the agency or third party must have obtained the appropriate enhanced DBS certificate including children's barred list information.

The school will:

- obtain the required written assurance;
- record the relevant information on the SCR;
- check the identity of the individual arriving at school; and
- ensure that the person presenting for work is the person in respect of whom the checks were completed.

The school will verify that the individual presenting for work is the same individual in respect of whom the checks were completed.

Contractors and self-employed individuals

Safeguarding requirements for contractors will be made clear within relevant contractual arrangements.

Any contractor or employee of a contractor working at Safe Start School will be subject to the appropriate level of safeguarding check.

Those engaging in regulated activity will require an:

enhanced DBS check including children's barred list information.

Other contractors whose work provides an opportunity for regular contact with children but who are not in regulated activity will normally require:

an enhanced DBS check without children's barred list information.

Where there is no opportunity for regular contact, the school will consider whether a basic DBS check or other safeguarding measures are appropriate.

Under no circumstances will a contractor on whom appropriate checks have not been obtained be allowed to work unsupervised or engage in regulated activity.

The school will determine the appropriate level of supervision based upon the circumstances.

For a self-employed individual, Safe Start School will either obtain the appropriate DBS check or inspect the certificate where the individual has obtained their own eligible check, ensuring that it is at the level required for the work being undertaken.

The identity of contractors and their employees will be checked on arrival.

Trainee and student teachers

Where a trainee teacher is employed and salaried by Safe Start School, the school will complete the required pre-appointment checks, including the appropriate enhanced DBS check with children's barred list information.

Where the trainee is fee-funded and checks are undertaken by the initial teacher training provider, Safe Start School will obtain written confirmation that:

- the required checks have been completed; and

- the provider has judged the trainee suitable to work with children.

The school may record fee-funded trainee checks on the SCR as additional information, although KCSIE does not require their inclusion in the same way as salaried trainees.

Volunteers

Volunteers undertaking regulated activity

Any volunteer undertaking teaching, training, instructing or supervising children frequently, on more than three days in any 30-day period, or overnight, will be regarded as undertaking regulated activity under the KCSIE 2026 arrangements.

Safe Start School will obtain:

an enhanced DBS check including children's barred list information.

This includes relevant existing volunteers whose role became regulated activity from 1 September 2026 as a consequence of the Crime and Policing Act 2026 changes.

Volunteers who are not in regulated activity

A volunteer on whom no appropriate checks have been obtained will never be left unsupervised or permitted to undertake regulated activity.

Where the role does not amount to regulated activity, Safe Start School will undertake a written risk assessment to determine the checks and safeguarding arrangements required.

The assessment will consider:

- the nature of the volunteer's work with children;
- the frequency and duration of contact;
- what the school already knows about the volunteer;
- any information available from staff, parents or other volunteers;
- whether the individual has employment or other volunteering activities from which appropriate references may be obtained;
- the level of supervision; and
- whether a basic or enhanced DBS check without barred list information is appropriate and legally available.

The risk assessment and decision will be recorded.

Proprietor body and school management

As an independent school, Safe Start School will comply with the specific requirements applying to members of its proprietor body.

The school will ensure that the required checks are undertaken on members of the proprietor body, including:

- enhanced DBS checks as required;
- identity checks;
- section 128 checks;
- appropriate overseas checks where required; and
- any other checks required by the Independent School Standards and KCSIE.

Where the proprietor is a body of people, the chair is responsible for ensuring the required checks are undertaken on the other members of the proprietor body.

The Secretary of State undertakes the specified checks in relation to the individual who becomes the proprietor or the chair of a body of persons which is the proprietor, in accordance with the Independent School Standards.

Any person undertaking a management position for which a section 128 check is required must not take part in the management of the school if prohibited from doing so.

Alternative provision

Where Safe Start School places a pupil with an alternative provision provider, Safe Start remains responsible for safeguarding the pupil.

Before and during the placement, the school will obtain written confirmation that the provider has carried out appropriate safeguarding checks on the adults working within the provision that Safe Start would otherwise have carried out for its own staff.

The provider will also be expected to notify Safe Start of arrangements which may affect the pupil's safeguarding, including relevant staff changes, so that Safe Start can assure itself that the appropriate checks have been completed.

Safe Start will conduct its own safeguarding due diligence and review alternative provision placements in accordance with the main body of this policy.

KCSIE 2026 expressly retains the commissioning school's safeguarding responsibility in AP placements.

Work experience

Where Safe Start School arranges work-experience placements, it will satisfy itself that the placement provider has appropriate policies and procedures for safeguarding children.

Where an individual providing teaching, training, instruction, care or supervision to a child on work experience does so frequently, on more than three days in a 30-day period, or overnight, that activity may constitute regulated activity.

The school will therefore consider the nature, frequency and circumstances of supervision and ensure that an individual who is barred is not permitted to undertake regulated activity.

Other adults within the workplace who are not responsible for teaching, training, instructing, caring for or supervising the child do not become engaged in regulated activity merely because the child is present in the workplace.

Host families and homestays

Where Safe Start School arranges for a pupil to stay with a host family to whom they are not related, the school will follow the homestay safeguarding requirements set out in KCSIE.

Where the arrangements constitute regulated activity, the appropriate enhanced DBS check including children's barred list information will be obtained in relation to relevant adults.

The school will consider whether checks on other household members aged 16 or over are appropriate.

Where hosting occurs overseas and equivalent DBS checks cannot be obtained, Safe Start School will liaise with its overseas partner to establish appropriate safeguarding assurances and ensure parents/carers understand the arrangements.

Pupils will know who to contact if they feel unsafe, uncomfortable or require assistance during the stay.

Where an arrangement may constitute private fostering, the school will fulfil its duty to notify the local authority as required.

Visitors

Safe Start School will maintain appropriate arrangements for managing visitors to its premises.

For visitors attending in a professional capacity, the school will:

- verify identity;
- be satisfied that the appropriate safeguarding/DBS check has been undertaken for the work being carried out; and
- where the individual is employed by another organisation, obtain appropriate assurance from that organisation.

Where an employer has confirmed that the correct check has been completed, Safe Start School will not routinely require the professional to produce their DBS certificate.

For visitors such as children's relatives attending events such as sports days, the school will not request DBS or barred-list checks simply because they are visiting the premises.

The Headteacher or appropriate senior leader will determine whether visitors require escort or supervision.

External speakers and organisations will be considered for suitability, including the educational value, age appropriateness and safeguarding implications of their involvement.

Single Central Record

Safe Start School will maintain a Single Central Record (SCR) of the required pre-appointment checks.

As an independent school, the SCR will include:

- all staff;
- salaried trainee teachers;
- agency and third-party supply staff, including individuals working for only one day; and
- all members of the proprietor body.

The school will ensure that the person presenting for work is the person in respect of whom the checks were completed.

The SCR will record, as appropriate, whether the following checks have been completed and the relevant dates:

- identity;
- barred-list check;
- enhanced DBS check/certificate;
- prohibition from teaching;
- section 128 prohibition where applicable;
- right to work in the UK;
- overseas checks;
- professional qualifications; and
- any other check which the Independent School Standards require to be recorded.

For agency and third-party staff the SCR will record the required written confirmation that the agency has undertaken the relevant checks.

The school may additionally record information such as:

- volunteer checks;
- safeguarding and safer recruitment training;
- the identity of the person carrying out checks; and
- other information considered useful for safeguarding assurance.

The SCR may be maintained electronically or in paper form.

Retention of recruitment documentation

Copies of documentation used to verify identity, right to work and required qualifications will be retained in accordance with the school's record-retention arrangements.

The school is not required to retain a copy of a DBS certificate simply in order to maintain its SCR.

Where the school has a legitimate reason to retain a copy of a DBS certificate or criminal-record information, it will be held securely and not normally retained for longer than six months.

Once destroyed, the school may retain a record confirming:

- that the check was undertaken;
- the outcome of the check; and
- the recruitment decision.

Ongoing safeguarding and referrals

Safer recruitment does not end when an appointment is made.

Safe Start School will maintain a culture in which staff are expected to:

- follow the Staff Code of Conduct;
- report safeguarding concerns;
- report low-level concerns;
- disclose relevant changes in their circumstances where required;
- understand whistleblowing arrangements; and
- cooperate with ongoing safeguarding checks where legally required.

Where the statutory criteria are met, Safe Start School will make referrals to the Disclosure and Barring Service and/or Teaching Regulation Agency as appropriate.

Recruitment records and decisions will be maintained sufficiently clearly to demonstrate that Safe Start School has fulfilled its safeguarding and safer recruitment obligations.

Appendix 3: Safeguarding concerns or allegations about adults working in or on behalf of the school

This appendix applies to safeguarding concerns or allegations about adults working in or on behalf of Safe Start School in a paid or unpaid capacity, including:

- employees;
- supply teachers;
- trainee teachers;
- volunteers;
- contractors;
- agency and third-party staff; and
- other adults working with children on behalf of the school.

The procedures in this appendix are consistent with Keeping Children Safe in Education 2026, Part Four and local safeguarding/LADO procedures.

There are two levels of concern:

1. Concerns or allegations that may meet the harm threshold

2. Concerns or allegations that do not meet the harm threshold, referred to as low-level concerns.

Section 1: Concerns or allegations that may meet the harm threshold

This section applies where it is alleged that a person working in or on behalf of Safe Start School 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; and/or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

These procedures apply whether the alleged behaviour occurred inside or outside school.

Transferable risk

Safeguarding concerns may arise from conduct within or outside school. Behaviour outside school which indicates that an individual may be unsuitable to work with children will be considered in terms of transferable risk. Where appropriate, an assessment of transferable risk will be undertaken and advice sought from the LADO where there is uncertainty.

Reporting an allegation

Concerns or allegations that may meet the harm threshold must be reported without delay.

Normally:

- allegations about a member of staff will be reported to the Headteacher;
- where the Headteacher is the subject of the allegation, the matter will be reported to the proprietor, who will act as case manager in accordance with KCSIE;
- where circumstances mean there may be a conflict of interest, advice will be sought from the LADO before determining how the matter should be managed.

Immediate safeguarding action

Where a child:

- has been harmed;
- may be at immediate risk of harm; or
- is in an emergency situation,

local authority children's social care and, where appropriate, the police will be contacted immediately.

The DSL or deputy DSL is responsible for ensuring that the child's welfare is safeguarded and for making or supporting any necessary referral to children's social care.

The case manager is responsible for managing the allegation concerning the adult and will discuss the nature, content and context of the allegation with the LADO and agree the appropriate course of action.

Initial enquiries

Before contacting the LADO, Safe Start School may undertake basic enquiries in accordance with local procedures to establish the basic facts.

These enquiries must not amount to an investigation and must not jeopardise a possible police or children's social care investigation.

They may include establishing:

- whether the individual was present at the school at the relevant time;
- whether they had, or could have had, contact with the child;
- whether witnesses were present; and
- whether relevant CCTV or other objective evidence exists.

Informing the person subject to the allegation

The timing and extent of information provided to the individual will be considered on a case-by-case basis.

The case manager will take advice from the LADO and, where appropriate, children's social care and the police before informing the individual where doing so could prejudice an investigation.

Allegations involving physical contact or restrictive intervention

Where an allegation concerns physical contact, reasonable force or restrictive intervention, the circumstances must be considered carefully.

Any consideration by the school, LADO, children's social care or police should take account of the lawful circumstances in which school staff may use reasonable force or restrictive intervention.

The fact that physical intervention has occurred does not itself establish that inappropriate conduct has taken place.

Welfare of other children or family members

Where concerns arise about the welfare of other children in the community or within the family of the adult subject to the allegation, the case manager will discuss this with the DSL or deputy.

A risk assessment will be undertaken and, where necessary, a referral to children's social care will be made.

Role of the LADO

The LADO does not normally investigate the allegation.

The LADO's role is to provide advice and oversight and ensure that an appropriate investigation takes place, whether undertaken by:

- police;
- children's social care;
- Safe Start School;
- an independent investigator; or
- a combination of these.

Where the allegation is straightforward and no external investigation is required, an appropriate senior member of staff may undertake the investigation.

Where the nature, complexity or circumstances of the allegation mean that internal investigation would not be appropriate, Safe Start School will secure an appropriately independent investigator. The school will ensure access to independent investigation is sourced where required.

No further action

Where the initial discussion with the LADO results in a decision that no further action is required, the case manager and LADO will:

- record the decision;
- record the reasons for the decision; and
- agree what information should be provided in writing to the individual concerned.

Progress and review of investigations

Allegations will be dealt with as quickly as possible while maintaining a thorough and fair process.

The case manager will monitor progress.

Where an investigation remains ongoing:

- the first review should, wherever possible, take place no later than four weeks after the initial assessment; and
- subsequent review dates should ideally be set at fortnightly intervals and no longer than monthly intervals.

Supply teachers, trainee teachers and contracted staff

Where the individual is not directly employed by Safe Start School, such as a:

- supply teacher;
- trainee teacher;
- agency worker; or
- contractor,

Safe Start School shares safeguarding responsibilities with the employing agency, training provider or other organisation.

Safe Start remains responsible for gathering the relevant facts and managing the safeguarding process while working closely with the individual's employer, agency or training provider, which will normally lead on employment or disciplinary action.

Safe Start will not cease using a supply teacher or contracted individual because of a safeguarding allegation without:

- establishing the facts;
- consulting the LADO; and
- determining an appropriate safeguarding outcome.

The relevant agency or organisation will be involved fully in the process and will be invited to appropriate meetings.

Previous safeguarding concerns or allegations known to the agency will be considered where relevant.

Where concerns relate to a trainee teacher, their teacher training provider will be involved and will be expected to follow the same safeguarding principles applicable to a supply agency.

Organisations or individuals using school premises

Where Safe Start School becomes aware of a safeguarding allegation relating to an individual or organisation using the school's premises to provide activities for children, including:

- community groups;
- sports organisations;
- clubs;
- tutors;
- service providers; or
- organisations providing extracurricular activities,

the school's normal safeguarding procedures will be followed.

This includes consideration of referral to the LADO.

The fact that the individual is not employed by Safe Start does not remove the need for safeguarding action where the concern comes to the school's attention.

Allegations involving members of the proprietor or governing body

Where an allegation concerns a member of the proprietor or governing body, Safe Start will follow the applicable local safeguarding and governance procedures and seek advice from the LADO.

Where an allegation is substantiated, consideration will be given to any action required in relation to that person's governance or management role.

Suspension

Suspension will not be an automatic response to an allegation.

The case manager will consider all reasonable alternatives before suspending an individual.

Suspension will normally be considered only where:

- there is cause to suspect that a child or children may be at risk of harm; or
- the allegation is sufficiently serious that dismissal may be a possible outcome.

Where there is uncertainty, advice will be sought from the school's HR adviser and LADO and, where involved, police and children's social care.

Possible alternatives include:

- redeployment so the individual has no direct contact with the child concerned;
- having another adult present during contact with children;
- redeployment to duties which do not involve unsupervised access to children;
- moving the child to another class or arrangement where this is in the child's best interests and takes account of their wishes and feelings;
- temporary redeployment to another role or location where appropriate.

Moving a child must not be presented as a punishment.

The case manager must consider the possible professional and reputational consequences of unnecessary suspension where allegations subsequently prove to be unfounded, unsubstantiated, malicious or false.

Where suspension is considered necessary, the rationale will be recorded, including:

- alternatives considered;
- why those alternatives were rejected; and
- the safeguarding basis for suspension.

Written confirmation will normally be provided within one working day.

The individual will be provided with a named contact.

Police or children's social care may express a view about suspension, but the decision remains with the employer/proprietor following an appropriate risk assessment.

Interim prohibition orders

Where Safe Start becomes aware that the Secretary of State has made an interim prohibition order in relation to a teacher, immediate action will be taken to ensure that the individual does not undertake teaching work contrary to that order while the Teaching Regulation Agency investigation is ongoing.

Supporting the child

The welfare of the child is paramount.

The DSL or deputy will ensure that:

- the child is appropriately supported;
- safeguarding risks are assessed;
- appropriate referrals are made;
- the child's wishes and feelings are considered; and
- appropriate measures are taken to protect the child from further risk or distress.

The school will also consider the needs of any other children who may have been affected.

Supporting the person subject to the allegation

Safe Start recognises its duty of care to staff and other adults involved in an allegation process.

Appropriate support may include:

- managing and reducing unnecessary stress;
- informing the individual of the likely process as soon as it is appropriate to do so;
- advising the individual that they may seek support from a trade union representative or colleague;
- appointing a named contact to provide updates;
- providing access to appropriate wellbeing, counselling or medical support; and
- ensuring that suspension does not automatically prevent social contact with colleagues unless this could prejudice the gathering of evidence.

Parents and carers

Subject to advice from the LADO, police and children's social care, parents or carers of the child involved will normally:

- be formally informed about the allegation as soon as appropriate;
- be kept informed about the progress of the case insofar as it relates to their child; and
- be informed of any relevant confidentiality requirements.

Information relating to the adult subject to the allegation will not be disclosed beyond what is lawful and appropriate.

Confidentiality and information sharing

Safe Start School will make every effort to maintain confidentiality and protect against unwanted publicity during an allegation process.

Information will be shared only with those who need it for safeguarding, investigative, disciplinary or legal purposes.

The case manager will seek advice from the LADO and, where relevant, police and children's social care regarding:

- who needs to know;
- what information can be shared;
- management of speculation, leaks or gossip;
- what information, if any, can be shared with the wider school community; and
- management of media interest.

Where police are involved, the school will, wherever possible, ask that relevant arrangements are made for statements or evidence to be shared for disciplinary purposes when legally permissible.

Reporting restrictions concerning teachers

The school recognises that legislation restricts publication of material which may identify a teacher who has been accused by, or on behalf of, a pupil at the same school in specified circumstances.

Parents/carers and others will be informed of confidentiality and publication restrictions where these apply.

Allegation outcomes

The following definitions will be used:

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 cause harm to the person who was the subject of the allegation.

False – there is sufficient evidence to disprove the allegation.

Unsubstantiated – there is insufficient evidence either to prove or disprove the allegation. This does not imply guilt or innocence.

Unfounded – there is no evidence or proper basis supporting the allegation.

Following a substantiated allegation

Where an allegation is substantiated and the individual:

- is dismissed;
- resigns;
- otherwise ceases to provide services; or
- the school ceases to use their services,

Safe Start School will consider and fulfil any legal referral duties.

DBS referral

There is a legal duty to make a referral to the Disclosure and Barring Service where the statutory referral criteria are met, including where the individual has engaged in conduct that harmed or is likely to harm a child or otherwise poses a risk of harm.

Teaching Regulation Agency

Where the individual is a teacher, the case manager will consider whether referral to the Teaching Regulation Agency is appropriate.

Resignations and settlement agreements

An investigation will not cease solely because an individual resigns, leaves employment, refuses to cooperate or the school ceases to use their services.

Every reasonable effort will be made to:

- establish the facts;
- give the individual an opportunity to respond;
- reach an outcome; and
- record that outcome.

Settlement agreements must not be used to prevent proper safeguarding investigation or statutory referrals where an allegation indicates that an individual may pose a risk of harm to children.

A settlement agreement cannot prevent the school from:

- making a legally required DBS referral;
- considering a TRA referral; or

- providing safeguarding information in a future reference where legally appropriate.

Unsubstantiated, unfounded, false or malicious allegations

Where an allegation is determined to be unsubstantiated, unfounded, false or malicious, the DSL and case manager will consider whether the child or person making the allegation requires additional help or support.

Where the allegation may represent a cry for help or indicate another safeguarding concern, consideration will be given to referral to children's social care.

Where an allegation is shown to have been deliberately invented or malicious, the school will consider whether appropriate disciplinary or other action is required. Any such decision will take account of the child's age, SEND, communication needs, vulnerability and individual circumstances.

Returning to work following suspension

Where an individual returns to work following suspension, the case manager will consider how best to support their return.

This will include consideration of:

- reintegration into the workplace;
- wellbeing support;
- appropriate communication with colleagues; and
- management of contact with the child or children involved.

Record keeping

For allegations which are substantiated, unfounded or unsubstantiated, the individual's confidential personnel record will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- action taken;
- decisions reached;
- the formal outcome;
- where appropriate, a copy provided to the individual; and
- confirmation of whether the matter should be referred to in a future reference.

Records of allegations found to be malicious or false will normally be removed from personnel records unless the individual consents to their retention.

Records will be retained at least until the individual reaches normal pension age or for 10 years from the date of the allegation, whichever is longer.

References

Employer references will:

- not include allegations found to be false, unfounded, unsubstantiated or malicious;
- not include repeated allegations where all have resulted in those outcomes; and
- include substantiated safeguarding allegations that met the harm threshold where relevant, ensuring the information is factual and does not include unsupported opinion.

Learning lessons

Safe Start School will consider learning throughout and at the conclusion of every allegation process.

For substantiated cases, the case manager and LADO will consider:

- whether policies or practice should change;
- whether the allegation identified weaknesses in safeguarding arrangements;
- whether staff require additional training;
- whether suspension was appropriate;
- whether the duration of suspension was appropriate; and
- whether a similar future investigation could safely be managed without suspension.

Learning will also be considered following allegations determined to be unfounded, false, malicious or unsubstantiated.

Non-recent allegations

Abuse can be reported regardless of how long ago it occurred.

Where a child makes a non-recent allegation against an adult working with children, this will be reported to the LADO in accordance with local procedures.

Where an adult reports that they were abused as a child, they will be advised to report the matter to the police.

The LADO will coordinate with children's social care and police as appropriate.

Section 2: Concerns that do not meet the harm threshold – Low-Level Concerns

Safe Start School recognises the importance of creating an open and transparent safeguarding culture in which concerns about adults are shared, recorded and addressed promptly.

This section applies to concerns about all adults working in or on behalf of Safe Start, including:

- employees;
- supply staff;
- trainee teachers;
- volunteers;
- contractors; and
- agency or third-party staff.

What is a low-level concern?

The term low-level concern does not mean that the concern is insignificant.

It means any concern, no matter how small, including a sense of unease or a "nagging doubt", 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 work; and
- does not meet the harm threshold or is not sufficiently serious to require consideration of a LADO referral.

Examples may include:

- being overfriendly with children;
- having favourites;
- taking photographs of pupils using a personal mobile phone contrary to school policy;
- meeting or communicating with pupils outside authorised professional arrangements;
- engaging with a pupil one-to-one in an unnecessarily secluded area or behind a closed door;
- humiliating a child;
- using inappropriate, intimidating, sexualised, discriminatory or offensive language;

- breaching professional boundaries; or
- conduct outside work which raises concerns about professional judgement or suitability.

Such behaviour may range from inadvertent or thoughtless conduct through to behaviour which could ultimately be intended to facilitate abuse.

Sources of low-level concerns

Low-level concerns may arise from:

- staff observations;
- suspicion;
- a complaint;
- disclosure by a child;
- information provided by a parent/carer or another adult;
- concerns outside school;
- pre-employment or ongoing vetting checks; or
- self-referral by the member of staff.

Sharing low-level concerns

All staff are expected to report low-level concerns promptly through the school's agreed safeguarding reporting procedure.

Staff are also encouraged to **self-refer** where, for example:

- they have found themselves in a situation which could be misinterpreted;
- their actions may appear compromising to others; or
- on reflection, they believe their behaviour fell below expected professional standards.

The Headteacher will be the ultimate decision-maker in relation to low-level concerns about staff, although the Headteacher may consult with the DSL.

Where the concern relates to the Headteacher, it will be referred to the proprietor.

Where there is any doubt as to whether a concern meets the harm threshold, advice will be sought from the LADO.

Responding to low-level concerns

Where a concern has been raised through a third party, the Headteacher or nominated deputy will gather sufficient information to understand the concern.

This may include speaking to:

- the person who raised the concern, unless the concern was raised anonymously;
- the individual concerned; and
- relevant witnesses.

This is a fact-finding process, not an assumption that misconduct has occurred.

The information will be used to determine:

- what type of behaviour occurred;
- whether it breaches the Staff Code of Conduct;
- whether further safeguarding or disciplinary action is required;
- whether the concern may in fact meet the harm threshold; and
- whether any wider safeguarding or organisational issue has been identified.

The decision, action taken and rationale will be recorded in writing.

Low-level concerns involving supply staff, contractors or trainee teachers

Where a low-level concern relates to supply staff, contractors or another externally employed person, the concern will be shared with their employer so that potential patterns of behaviour can be identified.

Where relevant to a trainee teacher, the teacher training provider will also be informed.

Recording low-level concerns

All low-level concerns will be recorded in writing.

The record will include:

- details of the concern;
- the context in which it arose;
- the name of the person raising the concern unless anonymity is requested and can reasonably be maintained;
- action taken;
- decisions made; and
- the rationale for those decisions.

Records will be:

- confidential;

- securely held;
- handled in accordance with applicable data protection legislation; and
- retained at least until the individual leaves employment, unless the school's record-retention arrangements require a longer period.

Identifying patterns and organisational learning

Low-level concern records will be reviewed regularly to identify patterns of inappropriate, problematic or concerning behaviour.

Where a pattern emerges, consideration will be given to:

- disciplinary action;
- referral to the LADO where the harm threshold may now be met;
- increased supervision or management;
- additional training;
- amendments to policies or procedures; and
- whether wider cultural or safeguarding issues within the school contributed to the behaviour.

Low-level concerns and references

Low-level concerns will not normally be included in employment references.

They may be included only where:

- they relate to matters which would normally be included in a reference, such as misconduct or poor performance; or
- a group or pattern of concerns has met the harm threshold and resulted in a substantiated safeguarding finding.

A low-level concern relating exclusively to safeguarding which did not meet the harm threshold will not be included merely because it was recorded as a low-level concern.

Appendix 4: Specific Forms of Abuse and Safeguarding Issues

Safeguarding issues rarely occur in isolation and different forms of harm may overlap. Staff should remain professionally curious and consider the full circumstances of the child, including harm occurring within the home, within peer groups, in the community and online.

If staff have any concern about a child's welfare, they must act on it immediately and follow the procedures within this policy. Where a child is suffering, or is likely to suffer harm, a referral to local authority children's social care and, where appropriate, the police must be made immediately.

Children who are absent from education

Attendance is a safeguarding issue. Repeated and/or prolonged absence from education can act as a warning sign of safeguarding concerns including abuse, neglect, exploitation, mental health difficulties, domestic abuse, radicalisation and other forms of harm.

Staff should consider the individual circumstances of the child and must not view absence solely as an attendance or behavioural issue. Where absence gives rise to a safeguarding concern, this must be reported to the DSL and appropriate safeguarding procedures followed.

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

- There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:
- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system

- Cease to attend a school
- Come from new migrant families

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Missing Children

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Inform a DSL and a member of the SLT. Delegate a staff member to search the school grounds and within the local area whereby after an agreed length of time with DSL/SLT the police will be notified along with parent/carers.
- If the child is under child protection or section 47 significant harm we will liaise with social workers, YOT team and any other external agency to inform them and keep them updated on the situation

If a child returns then a restorative pastoral intervention will take place in the aim to identify triggers or concerns. The information from this will trigger any relevant action or referrals that need to take place. If restrictions are necessary, the DSL will liaise with mentors and staff to put extra safeguarding monitoring in place for that child until it is deemed that the risk of absconding is significantly reduced.

Where a child has been missing from school, home or care, staff will consider whether the absence may be linked to extra-familial harm, including child criminal exploitation, child sexual exploitation, serious violence, trafficking, modern slavery, county lines or harmful peer relationships.

The child's views and experiences will be sought in a developmentally appropriate way, and consideration will be given to locations, people, peer groups and online environments associated with the missing episode.

Child criminal exploitation

Child criminal exploitation and child sexual exploitation can be committed or facilitated by an individual, group, organised network or gang. A child may identify as belonging to the group exploiting them and may not recognise themselves as a victim.

A child cannot consent to being exploited, abused or trafficked. Children who are criminally exploited must have their vulnerabilities recognised and should be treated as victims, including where they have committed offences as a consequence of coercion or exploitation.

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

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

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

Indicators of CCE can include a child:

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

- Not taking part in education

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

Child sexual exploitation

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE

may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

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

County Lines

County lines is a form of child criminal exploitation involving gangs or organised criminal networks using mobile phone lines or other forms of "deal line" to facilitate the supply of drugs. Exploitation may occur locally or involve travel to other areas.

Children may be exploited to move, store or sell drugs and money and may experience coercion, intimidation, violence, sexual violence, debt bondage or threats towards themselves or their families.

Children may be coerced into carrying weapons, including knives, or may begin carrying a weapon because they believe it provides protection.

Indicators may include:

- unexplained money, gifts or possessions;
- changes in peer groups or relationships;
- unexplained travel;
- missing episodes or persistent absence;
- multiple phones or unexplained phone activity;
- signs of assault or intimidation;
- drug-related activity;
- deterioration in wellbeing or engagement with education; and
- association with individuals known or suspected to be involved in criminal exploitation.

Staff must recognise that children with SEND, children who are absent from education, looked-after children and children with previous experiences of abuse or neglect may be particularly vulnerable to exploitation.

Concerns must be reported immediately to the DSL, who will consider children's social care, police and modern slavery referral arrangements as appropriate.

Modern Slavery and the National Referral Mechanism

Modern slavery includes exploitation such as human trafficking, slavery, servitude and forced or compulsory labour. Child criminal exploitation and child sexual exploitation may constitute modern slavery.

The National Referral Mechanism (NRM) is the UK framework for identifying and supporting potential victims of modern slavery and human trafficking.

Where staff suspect that a child may be a victim of trafficking or modern slavery, normal child protection procedures must be followed immediately. The DSL will consider the need for referral to children's social care, the police and the appropriate modern slavery/NRM process.

Modern slavery should not be considered separately from other safeguarding risks; children may experience overlapping forms of criminal, sexual and financial exploitation.

Domestic abuse

Domestic abuse can encompass a wide range of abusive behaviour, including physical, sexual, emotional or psychological abuse, violent or threatening behaviour, controlling or coercive behaviour and economic abuse. It may occur between intimate partners, former partners or family members.

Children may experience domestic abuse directly, witness or hear it, experience its effects or become involved in abusive dynamics within their own intimate relationships.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

Homelessness

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

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

Honour or faith-based abuse (including female genital mutilation and forced marriage)

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

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously) · Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

A girl:

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

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

Forced marriage

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Make an appropriate referral to local authority children's social care in accordance with local safeguarding procedures and, where necessary, the police.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

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

Terrorism is an action that:

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

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Where the school has a concern that a child may be susceptible to radicalisation or being drawn into terrorism, the DSL will consider the circumstances of the individual child and follow the school's Prevent procedures, including consideration of a referral to Channel where appropriate.

Where information relating to a Channel or Prevent concern needs to be shared with the police to safeguard the child or others, relevant information will be shared in accordance with safeguarding and information-sharing procedures.

Child-on-child abuse, including harassment and violence

Safe Start School recognises that children can abuse other children and that this can occur inside or outside school and online. Staff will maintain an attitude of **"it could happen here"**, even where no incidents have been reported.

Child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child alleged to have caused harm. It is preventable and must never be dismissed as "banter", "having a laugh", "part of growing up" or "boys being boys".

Child-on-child abuse can include, but is not limited to:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- physical abuse;
- serious physical violence or threats involving weapons;
- abuse within intimate personal relationships;
- harmful sexual behaviour;
- sexual harassment;
- sexual violence;
- making or sharing nudes and semi-nudes;
- upskirting;
- initiation or hazing-type behaviour;
- misogynistic, misandrist, racist or other discriminatory behaviour; and
- abuse facilitated or perpetrated online.

Staff must recognise that an absence of reports does not mean abuse is not occurring. Some children may find it particularly difficult to disclose abuse because of SEND, communication needs, fear, shame, loyalty to peers, coercion or previous experiences of not being believed.

All concerns must be reported and responded to in accordance with Section 7 of this policy.

Harmful Sexual Behaviour

Harmful sexual behaviour (HSB) may occur online, face-to-face or through a combination of both and must be considered within a child-protection context.

Children's sexual behaviour exists on a continuum ranging from developmentally expected behaviour through inappropriate or problematic behaviour to abusive or violent behaviour.

When considering sexual behaviour between children, Safe Start will take account of:

- the age and developmental stage of the children;
- SEND, cognitive ability and communication needs;
- differences in age, developmental level, physical size or status;
- power imbalance;
- coercion, manipulation or exploitation;
- frequency and pattern of behaviour;
- the wishes and experience of the child harmed; and
- the wider context in which the behaviour occurred.

A younger child may cause harm to an older child and chronological age alone will not determine whether a power imbalance exists.

Children displaying HSB may themselves have experienced abuse, trauma, neglect or exploitation. The school's response will therefore safeguard the child harmed while also considering the safeguarding and support needs of the child displaying the behaviour.

Staff will challenge inappropriate sexualised behaviour and misogyny at an early stage because tolerating or dismissing such behaviour can contribute to escalation into more serious sexual harassment or sexual violence.

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the sharing is consensual or non-consensual (Section 7.10.).

Serious violence All staff should be aware of indicators that may suggest a child is at risk from, or involved in, serious violence. These may include:

- increased or unexplained absence from education;
- significant changes in friendships or relationships;
- association with older individuals or groups;
- deterioration in educational engagement or performance;
- significant changes in wellbeing or behaviour;
- signs of assault or unexplained injuries;
- unexplained gifts, money or possessions;
- involvement with criminal networks or gangs;
- evidence of exploitation, coercion or debt;

- threats involving knives or other weapons; or
- possession, carrying or use of a weapon.

Staff should recognise that carrying a weapon may itself be linked to exploitation, coercion or a child's perceived need for protection.

A child involved in offending behaviour may also be a victim of abuse or exploitation. Staff must avoid viewing criminal behaviour in isolation from the child's safeguarding needs.

Where a pupil is known to have carried, threatened with or used a knife or other weapon, the DSL will ensure that the risk to the child and others is assessed and that an appropriate safety and support plan is considered.

Any concern about serious violence must be reported immediately to the DSL, who will consider safeguarding referrals and police involvement in accordance with the circumstances and local procedures.

Cybercrime

Children with particular skills and interests in computing and technology may become involved in cyber-dependent crime, either knowingly or without fully understanding the potential consequences.

Concerns may arise where a child is involved in activities such as unauthorised access to computer systems, creating or using malicious software, disrupting networks or other potentially unlawful online activity.

Staff should avoid assuming that technical ability or curiosity itself indicates criminality. Where behaviour raises safeguarding concerns, staff should report this to the DSL so that appropriate support, safeguarding intervention and specialist advice can be considered.

Child Abduction and Community Safety Incidents

Child abduction includes the unauthorised removal or retention of a child by a parent, family member, other known person or stranger.

Staff should also remain alert to community safety concerns around the school, such as unknown adults approaching pupils, individuals loitering near the premises or other behaviour which causes concern.

Pupils will receive age- and developmentally appropriate education about personal safety, with an emphasis on developing confidence and safe decision-making rather than simply teaching fear of strangers.

External Sources

Tameside Safeguarding Partnership





NSPCC

Worried about a child?

0808 800 5000
help@nspcc.org.uk

