



Safeguarding and Child Protection Policy 2023- 24

[adapted from the model South Gloucestershire
Safeguarding and Child Protection Policy
September 2023]

Author/Person Responsible	<i>Neil McKellar-Turner</i>
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Review Group	<i>Designated Safeguarding Leads</i>
Ratification Group	<i>FGB</i>
Review Frequency	<i>Annually</i>
Review Date	<i>By 30 September 2024</i>
Previous Review Amendments/Notes	<i>Updated to align with changes in KCSIE 2023</i>
Related Policies	<p>Attendance Allegations against staff; Behaviour; Children with health needs who cannot attend school; Code of Conduct; Complaints; Confidentiality; Data protection; Educational Visits; Health and Safety; Online Safety (along with separate parent/carer acceptable use and staff acceptable use policies); Special educational needs and disability; Staff discipline, conduct and grievance (procedures for addressing) Statement of procedures for dealing with allegations of abuse against staff Supporting pupils with medical conditions and Whistle-Blowing</p> <p>Link to list of all statutory policies for schools and academy trusts (document link)</p>



Chair of Governor's Signature

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices:	Child Protection Policy	DATE:	
EIA CARRIED OUT BY:		EIA APPROVED BY:	

Groups that may be affected:

Are there concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for a positive impact
Age (young people, the elderly; issues surrounding protection and welfare, recruitment, training, pay, promotion)		
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication)		
Gender reassignment		
Marriage and civil partnership		
Pregnancy and maternity		
Race		
Religion and belief (practices of worship, religious or cultural observance, including non-belief)		
Gender identity		
Sexual orientation		

Any adverse impacts are explored in a Full Impact Assessment.

1) Purpose of the Policy

At Christ Church Hanham CE Primary, we are committed to creating and embedding a culture of vigilance which:

- Ensures we maintain an attitude of "It could happen here"
- Ensures that our learners are safe and protected
- Ensures that our learners know who to talk to if they have concerns and are assured that their voices are heard
- Ensures that our learners are supported, protected and informed
- Ensures that our learners are safe from discrimination and bullying
- Ensures that our learners recognise when they are at risk and know how to get help when they need it
- Ensures that our learners understand about how to keep themselves safe as part of a broad and balanced PSHE and online safety curriculum
- Focuses on preventative work in relation to Trauma and adverse childhood experiences (ACEs) and takes a Trauma informed approach



This policy applies to all staff, students, governors, cover staff and volunteers.

Information Sharing

The school's information sharing policy is based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).

Keeping Children Safe in Education (2023), paragraph 57: DPA and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

KCSIE 2023, paragraph 119: 'This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk'

- 1.1 We take seriously our statutory and moral responsibilities to protect and safeguard the welfare of the children and young people in their care - "The welfare of the child is paramount." (Children Act 1989)
- 1.2 We will follow procedures set out by the South Gloucestershire Children's Partnership, which comprises of the council, the clinical commissioning group and the Police and take account of guidance issued by the DfE and the Local Authority (LA). The school will work under these arrangements as a named partner
<http://sites.southglos.gov.uk/safeguarding/children/>
- 1.3 We recognise that staff, because of their contact with and knowledge of children or young people in their care, are well placed to promote the well-being of children, protect them from harm, and respond to child protection or safeguarding concerns.
- 1.4 As part of the ethos of the school, the staff and governors are committed to:
 - ensuring the school practises safe recruitment in checking the suitability of staff and volunteers to work with students
 - ensuring that all staff and volunteers understand, and adhere to, the school's code of conduct
 - student health and safety
 - providing first aid as and when required
 - having clear processes regarding intimate care
 - meeting the needs of our students with medical conditions
 - having systems which support early identification and early help through the early help assessment process
 - developing Inclusive practice which promotes the voice of the child and seeks to reduce the barriers that students from vulnerable backgrounds may have and which may in turn affect their mental health and wellbeing, as well as their ability to share information about maltreatment and abuse
 - establishing and maintaining a safe school environment, where all students feel secure, can learn and develop, are encouraged to talk and are listened to;
 - including opportunities in the strands of the PSHE, Computing curriculum and whole school approach to care, guidance and support, for students to develop the skills they need to recognise, and stay safe from abuse
 - using the updated guidance on Teaching Online Safety in school June 2019 to review the learning opportunities for students in school ([document link](#))



- having regard to the DfE statutory guidance 2020 relationships education which is compulsory in all Primary Schools and that relationships and sex education is compulsory in all secondary schools ([guidance link](#))
- ensuring all teaching and support staff are aware of signs and symptoms of abuse, know the correct procedure for referring concerns or allegations against staff and receive appropriate training to enable them to carry out these requirements
- ensuring all volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection
- exercising their duty to work in partnership with other agencies and to share information with them, including attendance at child protection conferences, core groups and preparation of reports for conferences
- encouraging and supporting parents/carers, working in partnership with them
- supporting students in accordance with their agreed child protection plan
- a child centred approach, making it clear what our staff should do to keep children safe
- ensuring students know they can talk to staff confidentially by reminding them in assemblies, updating the student safeguarding board and signposting them as required. Best practice would be for schools to offer a range of ways for children and young people to share concerns so please list all ways that are available in your school

Safeguarding Young People

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment
- preventing impairment of children's mental health and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

2) Relationship to other policies

As well as ensuring that we address child protection concerns, we will also ensure that children who attend our school are kept safe from harm whilst they are in our charge. To this end, this policy should be read in conjunction with other relevant policies:

- Attendance
- Behaviour and Exclusions (including anti-bullying)
- Code of Conduct
- Complaints
- Educational Visits
- Equality
- Grievances



- Health and Safety
- Medical Needs (including intimate care);
- Online Safety (along with separate parent/carer acceptable use and staff acceptable use policies)
- PSHE
- Staff Code of Conduct
- Whistle-Blowing

3) Roles & Responsibilities

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is a member of the school's Senior Leadership Team. Our DSL is Neil McKellar-Turner (Headteacher). The DSL takes responsibility for Child Protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The Deputy Safeguarding leads are: Claire Adams (Inclusion Lead and SENCo) and Amy Pope (Pupil and Family Support Leader)

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

The DSL can be contacted out of hours using the email neil.mckellarturner1@christchurchhanham.org.uk

When the DSL is absent, the deputy DSL, Mrs Claire Adams, will act as cover and can be contacted using Claire.adams5@christchurchhanham.org.uk. In her absence, the second deputy DSL, Mrs Amy Pope, will act as cover and can be contacted using Amy.Pope2@christchurchhanham.org.uk.

If the DSL and Deputies are not available, an email should be sent to office@christchurchhanham.org.uk and this will be brought to the urgent attention of the DSL/ Deputy DSL.

All trips leaving the school will have the DSL mobile telephone number on their trip pack information.

- 3.1 All staff will be made aware of who the Designated Safeguarding Lead is and what their role is
- 3.2 Annex C, Keeping Children Safe in Education 2023, sets out clearly the role of the DSL in schools.

The role of the Designated Safeguarding Lead

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the designated safeguarding lead. This responsibility should not be delegated.



Managing referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and in liaison with the Head of Personnel
- refer cases where a crime may have been committed to the Police as required. *NPCC- When to call the police* should help understand when to consider calling the police and what to expect when working with the police. [When to call the police - NSPCC](#)

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners (Local authority, the clinical commissioning group (CCG) and the chief officer of police for an area any part of which falls within the council area).
- liaise with the headteacher to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirements for children to have an appropriate adult.
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, service providers and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.

(taken from KCSIE 2023 page 165)

Training

The Designated Safeguarding Lead and any deputies will be trained to an advanced level by attending Advanced Inter-agency Child Protection training and this will be maintained by attending CP Update training every 2 years thereafter. The DSL will undertake Prevent awareness training. This training will provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care, so they can:



- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's safeguarding and child protection policy and reporting procedures, especially new and part time staff
- ensure all new staff attend safeguarding induction training and that relevant staff have read and understood Part 1 and Annex B(if working directly with children) and Annex A (if not working directly with children) of KCSIE 2023
- ensure that all staff have read and understood Part 1 and Annex B (if working directly with children) or Annex A (if not working directly with children) of KCSIE 2023 and provide a yearly update training session during INSET to all staff as well as on-going CPD during the year for staff to support the culture of safeguarding
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, within the school, and with the three safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals using CPOMS
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or at home
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking into account their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via bulletins, meeting other designated safeguarding leads at DSL Forums and participating in training and school reviews, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role
- ensure all staff have regular update updated online safety training, including an understanding of all the expectations, roles and responsibilities around filtering and monitoring.
- Keep a training plan for the school which shows all training throughout the year

Raise Awareness

The designated safeguarding lead will:

- ensure the school's safeguarding and child protection policy is known, understood and used appropriately



- ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect will be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with all school staff so that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort
- support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child protection file

Where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives. More information on the child protection file is in Annex C. (As per KCSIE 2023 paragraphs 122 & 123)

Availability

During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

Reporting

The Designated Safeguarding Lead will provide the Governing Body with termly information and updates in relation to safeguarding including the number of incidents recorded in school as well as the number of referrals made to the Access and Response team (ART). An annual safeguarding report (reviewing previous academic year) will be presented to the Governing Body during the spring term.

School safeguarding profile



Our regular safeguarding analysis helps us to identify any key trends, patterns or particular safeguarding issues. Our safeguarding analysis has shown that our main concerns are in the area of:

- Social, Emotional and Mental Health (SEMH)

Our school will be alert to the potential needs of the following vulnerable children in relation to safeguarding and child protection and in their need for early help:

Children and young people with **special educational needs and disabilities** can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers;
- children with special educational needs, without an EHCP could be more vulnerable;
- they are often isolated, may have difficulty in communicating effectively and lack confidence to talk to adults

Our internal support processes will ensure that students with SEN and disabilities have adequate pastoral care.

Other vulnerable groups that we monitor closely that may need early help processes in place students who:

- have English as an additional language
- are young carers
- have previously suffered child-on-child abuse
- are showing signs of engaging in anti-social or criminal behaviour
- have previously been looked after and are now adopted from care as they remain potentially vulnerable
- are misusing drugs or alcohol
- are at risk of being radicalised or exploited
- are privately fostered children
- are at risk of modern slavery, trafficking and or exploitation, such as county lines
- are in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence
- have returned home to their family from care
- are showing early signs of abuse and/or neglect
- where contextual safeguarding issues are known

Preventing Harm

We recognise that developing the necessary qualities (e.g. emotional resilience, self-confidence) within both the children themselves and the school as a whole can help to prevent harm.

The school will therefore:



- establish and maintain an ethos where children and young people feel secure, are encouraged to talk and are listened to
- ensure children and young people know that there are adults in the school who they can approach if they are worried or in difficulty
- pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities as part of our broad and balanced curriculum. Included are the curriculum activities and opportunities that equip children and young people with the skills they need to stay safe from abuse and ensure that they know who to turn to for help. This is delivered mainly through our PSHE, online safety programme, sex and relationships education programme, whole school 'Learning for Life' programme which includes whole school assemblies (e.g., NSPCC, Anti-Bullying Week, Mental Health Awareness) and our termly focus on Christian values such as friendship and respect. Through these, children are helped to recognise risks and provided with strategies and support to enable them to get help when they need it; and
- include in the curriculum materials which will help children and young people develop realistic attitudes to the responsibilities of adult life, particularly with regard to the care of children and young people.

Early Help

Keeping Children Safe in Education 2023 states that “**All** staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years”. Staff should discuss early help requirements with the DSL (or a deputy). We follow the South Gloucestershire early help process which includes the use of the Early Help Assessment and Plan (EHAP). It may be appropriate for a member of school staff to initiate an EHAP and take on the role of Lead Professional or become a member of a Team around the Child/Family (TAC/F) as part of the EHAP process. If this is the case, then the staff member should be supported by the DSL, for example, by being given time to write the EHAP and attend TAC/F meetings. All staff should have an understanding of the EHAP process and how they can contribute to it as and when appropriate.

Designated Governor

The Designated Governor for Safeguarding at this school is Mrs Sheila Richards and can be contacted on the following email: sheila.richards@christchurchhanham.or.uk

The responsibilities of governing bodies, proprietors and management committees are outlined in part two of Keeping Children Safe in Education 2023.

Local Authority Designated Officer (LADO)

Tina Wilson. Contact details are:

Tel. 01454 868508

Email. [ladosouthglos.gov.uk](mailto:lado@southglos.gov.uk)

4) Types of abuse and specific safeguarding issues

Child abduction and community safety incidents

Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE)



Children Missing from Education
Children absent from Education

Children with a social worker
Children and the Court System
Children with family members in prison
County Lines
Cybercrime
Domestic Abuse
Drugs
Fabricated illness
Faith Abuse
Female Genital Mutilation (FGM) & FGM mandatory reporting duty for teachers
Forced Marriage
Gangs and Violence
Homelessness
Honour based Abuse
Mental Health
Private Fostering
Serious youth violence
Sexting
Sexual violence and sexual harassment between children in schools and colleges
Teenage abusive relationships
The Prevent duty - Preventing radicalisation and being drawn into extremism
Trafficking and modern slavery (including the National Referral Mechanism)
Upskirting

Indicators of abuse and neglect

ABUSE

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. (see paragraph 26 in Keeping Children Safe in Education 2023)

PHYSICAL ABUSE

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (see paragraph 27 in Keeping Children Safe in Education 2023)

EMOTIONAL ABUSE

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from



participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. (see paragraph 28 in Keeping Children Safe in Education 2023)

SEXUAL ABUSE

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. (see paragraph 29 in Keeping Children Safe in Education 2023).

NEGLECT

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (see paragraph 30 in Keeping Children Safe in Education 2023)

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. (Keeping Children Safe in Education 2021)

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being



- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Definition from Keeping Children Safe in Education 2021) It is important that staff are aware of the risk factors and alert the DSL if there are concerns.

Key indicators of children and young people being sexually exploited can include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties



- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Practitioners should also be aware that many children and young people who are victims of sexual exploitation may not recognise themselves as such but they should still be regarded as victims.

Children who are Absent from Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and guidance on school attendance can be found: [Working together to improve school attendance](#), including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

Children Missing Education (CME)

In response to the guidance in Keeping Children Safe in Education the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards)
 - e. are permanently excluded



We ensure that where a child is taken off our roll this is in the best interests of the pupil.

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Children with a social Worker

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

At Christ Church Hanham CE Primary, the Designated and Deputy DSLs ensure open communication with social workers. For any child who is identified as 'looked after' (LAC), or has involvement with a social worker, the school will ensure regular communication in relation to any safeguarding, welfare or attendance concerns. For children who are looked after, communication with the social worker will also take place through the Personal Education Plan (PEP) process.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. (Definition from Keeping Children Safe in Education 2023)

Children and young people can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.



All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. (Keeping Children Safe in Education 2023 page 145)

[Domestic-Abuse-Toolkit-May-2021.pdf \(southglos.gov.uk\)](#)

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.



The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases. All other staff should share concerns directly with the Designated Safeguarding Lead and do not need to contact the police personally.

Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Mental Health

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

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy through the normal safeguarding referral processes.

The Prevent duty

[Note there is no requirement to have a separate policy for the Prevent duty, but schools in higher risk areas might wish to do so]

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead and staff have received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.



We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent Duty does not require teachers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

The safeguarding procedures outlined above need to be followed in exactly the same way should staff have a concern about potential radicalisation or undue influences.

Child-on-child abuse, including sexual violence, sexual harassment and upskirting.

Staff should be aware that children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but not limited to):

- bullying (including cyberbullying);
- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or a group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their



educational attainment. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and offline (both verbal and physical) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh”, or “boys being boys”
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

We believe that all children have the right to attend school and learn in a safe environment. Children should be free from harm by adults in school and other students.

It is recognised that some students will at times negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s behaviour policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

At school, we will support pupils by enabling them to feel safe to disclose or talk about any concerns that they may have, safe in the knowledge that they will be listened to, and their concerns will be taken seriously. Awareness and prevention will be through our PSHE curriculum and whole school safety programme which will promote areas such as personal safety, healthy relationships, and appropriate behaviours. This will also be addressed through our school’s behaviour and values system.

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or groups and may be at risk of criminal exploitation. All staff should be aware of the range of



risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance. (Keeping Children Safe in Education 2021)

Sharing nudes and semi-nudes

In cases of 'sharing nudes and semi-nudes' we will follow guidance given to schools and colleagues by the UK Council for Child Internet Safety (UKCIS) published in 2020 – 'Sharing nudes and semi-nudes – advice for education settings working with children and young people & Responding to incidents and safeguarding children and young people' ([document here](#))

Your responsibilities when responding to an incident:

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

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

Sexual Activity and the under 18s

A précis of the Law regarding Sexual Activity and U18s

The age of consent for all sex is 16, whether straight, gay, trans or bi-sexual. The Sexual Offences Act 2003 makes it easier to prosecute people who pressure or force others into sexual activity.

Under 16s

If under 16 activity is consensual it may be less serious than if the child were under 13 but may nevertheless have serious consequences for the welfare of the young person. Consideration should be given in every case involving a child aged 13-15 as to whether there should be a discussion with other agencies and whether a referral should be made to children's social care. The younger the child, and the wider the age gap between participants, the greater the concern (even 3 years' age difference may be worrying if one of the children is young and/or vulnerable). Where confidentiality needs to be preserved, a discussion can still take place as long as it does not identify the child (directly or indirectly).

Under 13s

A child under 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity. In all cases where the sexually active young person is under the



age of 13, there must be a formal recorded consultation with the Children & Young People Social Care.

16 & 17 Year Olds

Although sexual activity in itself is no longer an offence over the age of 16, young people under the age of 18 are still offered the protection of Child Protection Procedures under the Children Act 1989. Consideration still needs to be given to issues of sexual exploitation through prostitution, and abuse of power. Although they may be over 16, young people under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust/authority, or a family member as defined by the Sexual Offences Act 2003.

Sharing Information with Parents

If a young person is under 16, professionals should encourage the young person, at all points, to share information with their parents wherever safe to do so. However parental advice is not needed if a young person under 16 can understand the issues and appreciate the consequences. This also applies to those living in care. Decisions to share information with parent will be taken using professional judgement, and the Child Protection Procedures.

Giving Advice, Contraception &/or Access to Services to Under 16s

Under the Sexual Offences Act 2003, youth support workers **can** help young people under 16 (including under 13s, but see section above) to seek contraception and sexual health advice/services (including giving out condoms), without being seen to facilitate an illegal act.

Any intervention must take place within the Fraser Guidelines and Child in Need/Child Protection Procedures

Practitioners using the Fraser guidelines should be satisfied of the following (taken from NSPCC website):

- the young person cannot be persuaded to inform their parents or carers that they are seeking this advice or treatment (or to allow the practitioner to inform their parents or carers).
- the young person understands the advice being given.
- the young person's physical or mental health or both are likely to suffer unless they receive the advice or treatment.
- it is in the young person's best interests to receive the advice, treatment or both without their parents' or carers' consent.
- the young person is very likely to continue having sex with or without contraceptive treatment.

Child protection concerns

When using Fraser guidelines for issues relating to sexual health, you should always consider any potential child protection concerns:



- Underage sexual activity is a possible indicator of child sexual exploitation and children who have been groomed may not realise they are being abused.
- Sexual activity with a child under 13 should always result in a child protection referral.
- If a young person presents repeatedly about sexually transmitted infections or the termination of pregnancy this may be an indicator of child sexual abuse or exploitation.

We will always consider any previous concerns that may have been raised about the young person and explore whether there are any factors that may present a risk to their safety and wellbeing.

We will always share child protection concerns with the relevant agencies, even if a child or young person asks us not to.

Private Fostering

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or can be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Online Safety

We have an effective whole school approach to online safety in order to protect and educate pupils and staff in their use of technology. We have mechanisms to identify, intervene in, and escalate any concerns where appropriate.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan. Use of the internet has many benefits for learning however when used inappropriately this can put pupils at risk. Filtering and



monitoring systems on their own are not sufficient to address this and pupils need to be provided with clear guidance on how to keep themselves safe and minimise these risks both in and outside school. To address this, as a school we share with parents, via our school website, up to date information and guidance about online learning and keeping pupils safe when not in school. The school will also refer to the addendum to [Safer Working Practices ... April 2020](#) in light of the increased use of online learning during the pandemic. Our Safeguarding and online safety addendum, for use during remote learning, is available from our [website](#).

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

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, 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. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group ([link here](#)) (KCSIE 2023 pg 35/36)

We train staff, as part of their induction, on safe internet use, filtering and monitoring and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members have annual refresher training.

Working with parents and carers

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online
- Know the procedures for reporting any issues they become aware of immediately to the school to minimise risk to their own and other children and so that the school can take appropriate action.
- We will use the school website, social media platforms and parent newsletters to offer advice and guidance to parents in relation to online risks.

5) The Management of Safeguarding

Governing Body



- 5.0 The Governing Body will have a Designated Governor with responsibility for Safeguarding; this is **Sheila Richards**.

The Designated Governor will ensure that they utilise the experiences and expertise of staff when shaping safeguarding policies. Opportunities for staff to contribute to safeguarding arrangements and child protection will be provided. They will also be responsible for jointly undertaking the annual 175 safeguarding audit with the Headteacher and Designated Safeguarding Lead. An action plan following the audit will be produced and the GOVERNING BODY will ensure that any actions are met in a timely manner.

- 5.1 The Governing Body will receive the Annual Safeguarding Report in the spring term for the previous academic year and will review safeguarding practices in the school no less than annually to ensure that:

- The school carries out its statutory duties related to child protection and safeguarding, including the South Gloucestershire Children's Partnership requirements
- Sufficient resources are made available to enable necessary tasks to be carried out properly under inter-agency procedures
- Governors attend Child Protection / Safeguarding training
- Only persons suitable to work with children shall be employed in the school or work in a voluntary capacity as detailed in Keeping Children Safe in Education 2021
- Where safeguarding concerns about a member of staff are substantiated, appropriate action is taken.

The Governing Body will delegate responsibility for day-to-day procedures that ensure the smooth operational practice for safeguarding arrangements to the Headteachers and Designated Safeguarding Leads; this may be reported to Governors retrospectively.

Children missing from education

The Governing Body will ensure that appropriate safeguarding responses to children who go missing from education are in place, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risk of them going missing in future.

Where reasonably possible, the school will hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child missing from education is also identified as a welfare and/or safeguarding concern.

- 5.2 The Governing Body will ensure that weaknesses identified within the Annual report; through on-going monitoring of safeguarding and child protection procedures and other sources, are addressed explicitly within the School Improvement Plans. The governing body will regularly monitor the implementation and impact of the identified actions.
- 5.3 The Governing Body will ensure that appropriate filters and monitoring systems are in place for the school and will identify the steps required to ensure that the monitoring of internet use, particularly for vulnerable students such as those with special education needs and disabilities, is robust. Advice and recommendation from the Safer Internet Centre will be used to fulfil this role.



- 5.4 The Governing Body controls the use of the school premises both within and outside school hours and has a duty to safeguard children and young people using the premises. Where services or activities are provided separately by another body, the Governing Body will seek assurances that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection.

HR/Personnel Lead (School Business Manager)

- 5.5 Part 3 of KCSIE 2023 sets out clearly the requirements and processes in relation to Safer Recruitment and these are fully detailed in the Safer Recruitment Guidance (appendix D).

In addition to the requirements within Schools Recruitment policy, the School Business Manager will ensure that:

- All volunteers to the school have read either Part 1 (if working directly with children) or Annex A (if not working directly with children) of Keeping Children Safe in Education 2023
 - All staff have read Part 1 (if working directly with children) or Annex A (if not working directly with children) of Keeping Children Safe in Education 2023 and this is recorded on the SCR
 - All staff have completed their Prevent training ([training link here](#)) and this is recorded on the SCR
 - Keep records of online staff training and the signing requirements for policy reading
- 5.6 The School Business Manager will ensure that the school's Single Central Record (SCR) is accurately maintained as an ongoing, accurate and live record and includes any enquiries made regarding disqualification by association
- 5.7 In relation to induction and training of new staff, the School Business Manager will ensure that they:
- Use a safeguarding induction checklist and retain this in the front of the staff file, ensuring that staff have copies of all of the policies required
 - Have Safeguarding and Child Protection training on induction
 - Have read and signed as understood the School's Code of Conduct
 - Understand, under legislation, their duty to provide information which would disqualify them by association
 - Know and understand the school's internal process for reporting safeguarding concerns including providing access to CPOMS

All staff

- 5.8 The school has a duty to ensure that professional behaviour applies to relationships between staff and young people and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. Information on [Safer Working Practice in Schools April 2020](#)

Staff should be explicitly aware of the dangers inherent in:

- working alone with a young person
- physical interventions
- cultural and gender stereotyping
- dealing with sensitive information
- giving to and receiving gifts from students and parents



- contacting young people through private telephones (including text), email or social networking sites.
- disclosing personal details inappropriately
- meeting students / young people outside school hours or school duties
- using their personal phones to take pictures of students, which is not permitted under any circumstance

5.9 If a member of staff has reasonable suspicion that a young person is suffering harm and fails to act in accordance with this policy and South Gloucestershire Partnership procedures, this will be viewed as misconduct and appropriate action will be taken by the Headteacher.

5.10 Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that abuse may have occurred **must** report it immediately to the Designated Safeguarding Lead or their Deputy in their absence. **Confidentiality must be maintained and information relating to individual students/families shared with staff on a strictly need to know basis.** It is then the reporting member of staff's personal responsibility to follow up with the Designated Safeguarding Lead.

5.11 All members of staff have a duty to attend whole school training on safeguarding children that will enable them to fulfil their responsibilities in respect of safeguarding and child protection effectively; this training will be provided by the Designated Safeguarding Lead and Deputy DSL every year.

Induction safeguarding Training – this is mandatory and will include types of abuse and indicators of abuse, the schools safeguarding systems, key personnel, the early help process, what to do if a child discloses abuse, how to manage confidentiality, what to do if they have concerns about a member of staff, the requirements of recording and reporting, online safety, child exploitation, child-on-child abuse, sexual violence and harassment, upskirting, response to children going missing from education, FGM and Prevent. New staff will complete the safeguarding checklist which will include:

- the child protection and safeguarding policy;
- the behaviour policy;
- Staff code of conduct;
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

All staff will then receive regular training updates throughout the year in addition to their yearly updated training on the types and signs of abuse and school specific training.

5.12 Primary Specific

The DSL will:

- Ensure that the relevant staffing ratios are met, where applicable
- Make sure each child in the Early Years Foundation Stage is assigned a key person (in nursery settings)
- Where appropriate, inform Ofsted of allegations and actions taken, within the necessary timescale



- Take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.74).
- Note the requirements set out in paragraph 3.75 of the statutory framework for the Early Years Foundation Stage
- Ensure that all staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the schools Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is **0800 028 0285** or you can contact them by emailing them directly using help@nspcc.org.uk

Parents

- 5.13 School is committed to helping parents/carers understand its responsibility for the welfare of all students.
- 5.14 Parents/carers will be made aware of the school's Safeguarding and Child Protection Policy via the school's website, initial meetings with parents of new students and prospectuses; full copies of the policy will be available upon request to the school.
- 5.15 Where possible, Child Protection concerns should be discussed with parents/carers by the DSL or Deputy DSL, who ideally should seek agreement to making a referral, unless to do so would place the student at increased risk of significant harm; however, a lack of agreement should not stop a referral going ahead.
- 5.16 Where possible the school will endeavour to provide support for parents/carers in meeting their responsibilities for their child's welfare; signposting to other agencies which may support, such as Parenting Courses.
- 5.17 Parents are required to provide the school with two emergency contact numbers.

6) Implementation



Procedures for Referral

Following a safeguarding concern being raised, the designated safeguarding lead or deputy safeguarding lead will immediately inform Social Care Teams by telephone:

South Glos. Access and Response (Student's home postcode falls within South Glos)
Telephone number 01454 866000

Bristol Children's Services (Student's home postcodes fall within Bristol)
Telephone number 0117 9038700

If the DSL or DDSL are not available, staff should speak to a member of the SLT and/or take advice from local children's social care using the numbers above.

The DSL or DDSL will contact the Local Authority Designated Officer (LADO), Tina Wilson on 01454 868508 or lado@southglos.gov.uk in relation to allegations against a member of staff

It is important to remember that options in response to staff raising a concern may not lead to a referral to ART being made. This would always follow a discussion with the DSL. Other options may include:

- Managing the support for the student internally through our own integrated student support processes
- An early help assessment, which staff might be required to help with or lead
- A referral to a statutory service

If in exceptional circumstances, the DSL or Deputy DSL are not available, this should not delay appropriate action being taken by the member of staff.

- 6.2 If requested, the telephone referral to the Social Care Team will be confirmed as a written referral within a maximum of 24 hours, with a copy placed on the student's Child protection record on CPOMS, maintained by the Designated Safeguarding Lead. Essential information will include student's name, address, date of birth, family composition, and reason for referral, name of person receiving the referral and any advice given.

Record Keeping

- 6.3 Any member of staff receiving a disclosure of abuse, or noticing possible abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event into context, and giving the date, time and location. All records must be dated and signed and discussed with the Designated Safeguarding Lead or Deputy Safeguarding Lead.
- 6.4 All hand-written records will be retained, even if they are subsequently typed up in a more formal report and these will be uploaded to CPOMS.
- 6.5 Written records of concerns about students should be kept, even where there is no need to make an immediate referral. Where concerns do not meet the threshold for a referral to Social Care, consideration should be given to the appropriateness of completing an early help assessment.



- 6.6 In line with the South Gloucestershire CSE strategy, the DSL and Deputy DSL will be alert for any indicators that a child is at risk of child sexual exploitation and, if required, will complete an Exploitation Identification Tool and pass concerns directly to Access and Response.
- 6.7 All records relating to child protection concerns will be kept in a secure cabinet and will remain confidential, although the safeguarding team now record directly into CPOMS. They do not form part of the student's educational records and should be retained separately and are not required to be disclosed to parents/carers, except by agreement with the school.
- 6.8 A chronology will be kept of individual student concerns using CPOMS which is reviewed and updated whenever a new concern is raised, noting any action.
- 6.9 Child protection records must be kept for a minimum of 25 years after the student has reached the end of compulsory education; the school will also retain all additional safeguarding records for 25 years in a confidential archive separate from a students' individual file.

7) Allegations made against staff

Part 4 of KCSIE 2023 sets out the responsibility of schools in relation to managing allegations against staff and these are set out fully in the **Schools Managing Allegations against Staff** policy. This guidance will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors 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 that he or she would pose a risk of harm to children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 7.0 Then the allegation will be dealt with in accordance with national guidance and agreements, as implemented locally by the South Gloucestershire Children's Partnership
- 7.1 Allegations against a member of staff should be brought to the attention of the Headteacher in the first instance, unless the Headteacher is the subject of the allegation; in this situation the allegation should be referred to the Chair of Governors. They will follow the LA 'Guidance for Chairs of Governors Dealing with Child Protection Allegations Against the Headteacher' and will contact the Local Authority Designated Officer (LADO) without delay. If the Designated Safeguarding Lead is the subject of the allegation (and they are not the Headteacher) then this needs to be brought to the attention of the Headteacher.
- 7.2 An allegation must not be discussed with the alleged perpetrators or other members of staff / governors, unless advised to do so by a LADO. All concerns against a member of staff must be reported without delay.

These procedures are also included in staff training.

Physical Contact, restraint and the use of reasonable force



- 7.3 Members of staff may have to make physical interventions with children; this should only be done where:
- It is necessary to protect the child, or another person, from immediate danger, and
 - Where the member of staff has received suitable training such as positive handling training
 - Individual plans for vulnerable children to reduce risk, such as those with SEN and disabilities are in place
 - Use of reasonable force applies to students with or without SEN

Photographing Children in school

- 7.4 Parents and Carers may take photographs during certain events such as school performances and sports' days. However, staff will remind parents that any such photographs must be for their own sole use only. Photographs are not permitted to be shared on social media. If there are any concerns about the safety of a child should their photograph be shared online (eg a LAC pupil, then the school reserves the right to forbid any photographs from being taken. Photographs are not permitted during other visits to the school and parents will be reminded about not using a mobile phone whilst in school except for the reasons stated above.
- 7.5 We will not allow images of students to be used on school websites, publicity, or press releases, without express permission from the parent/carers, and if we do obtain such permission, we will not identify individual children by name.
- 7.6 The school cannot however be held accountable for photographs or video footage taken by parents/carers or members of the public at school functions.
- 7.7 Photography will be used across the school as a tool to support assessment and to provide evidence of, and celebration of, curriculum coverage. However, staff will not use personal cameras or mobile phones to take photographs of children; all photographs will be taken on school cameras.
- 7.8 Staff are not permitted to use their own mobile devices to take pictures of students in the school.
- 7.9 Staff can bring their mobile devices into school but these must be locked away during student contact time.
- 7.10 Visitors to the school must be reminded when signing in that they cannot have their mobile phones out whilst on the premises

Low-level concerns

We encourage all concerns to be shared with the DSL or Headteacher and this includes low level. The term 'low-level' concern does not mean that it is insignificant; low-level means that the behaviour towards a child does not meet the threshold set out above. #

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious



enough to consider a referral to the LADO (as per Keeping Children Safe in Education 2023 pg 87).

Where any member has a low-level concern, they must complete a low-level concerns form and pass to the Headteacher as soon as possible. The Headteacher will then decide on the most appropriate course of action and document this in a secure electronic location.

Contextual Safeguarding (Extra Familial Harm)

Safeguarding incidents and/or behaviours can be associated with factors outside of school and can occur between children outside of school. All staff, but especially the DSL and Deputy DSL, will consider the context within such behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that a threat to their safety and welfare. We will ensure that such information forms part of the referral we make to the Social Care teams.

8) Monitoring & Review

The governing body are responsible for overseeing the implementation of this policy, monitoring and evaluating its impact; they will also review it every year, or sooner if appropriate.

The Designated Safeguarding Lead for Safeguarding will, on behalf of the Headteacher, complete an annual audit of Child Protection and Safeguarding to evaluate the effectiveness of the school's procedures.

Ratification

Approved by the governing body.

Publication

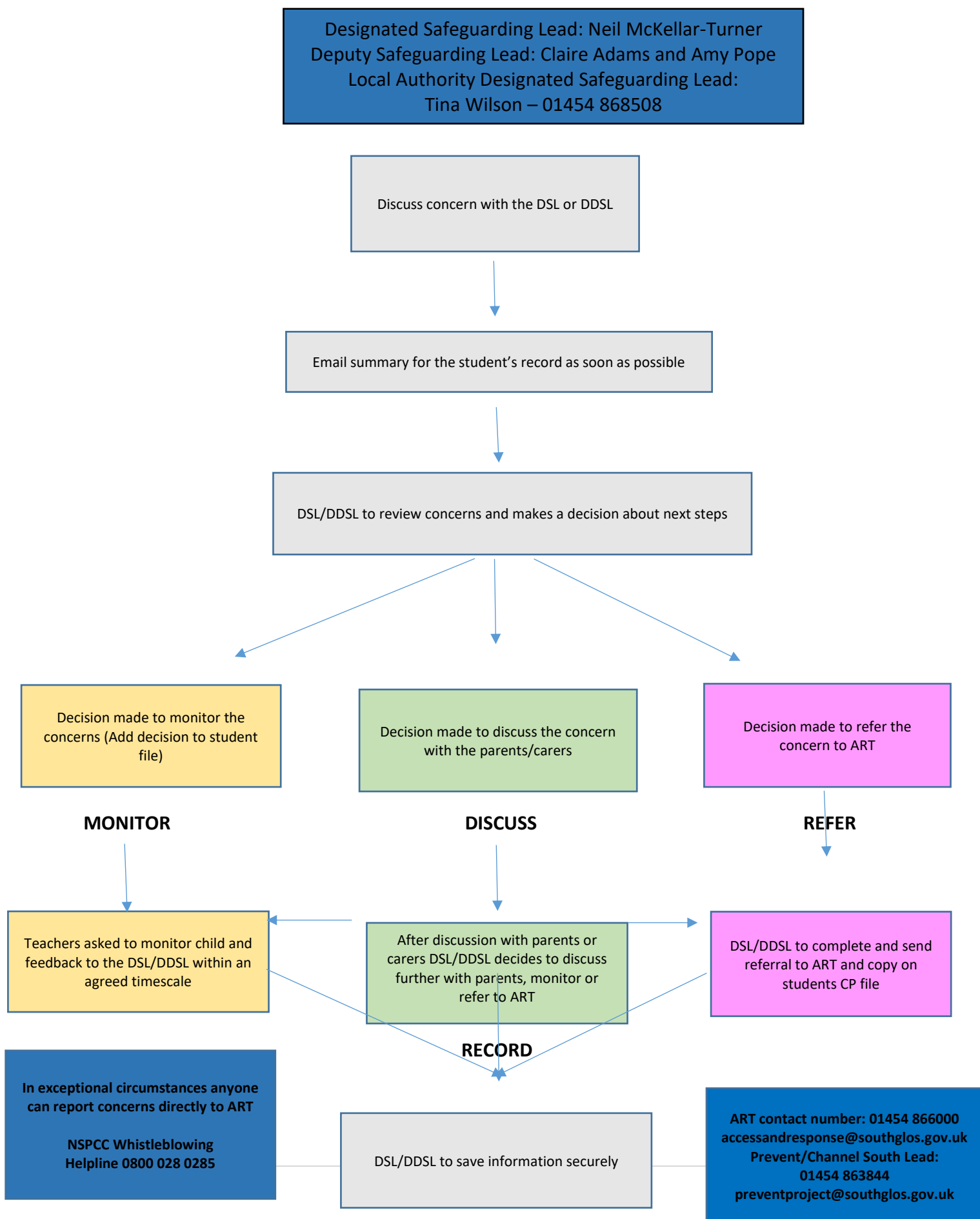
This policy can be found on the school website, and the staff Shared drive in school.

Review

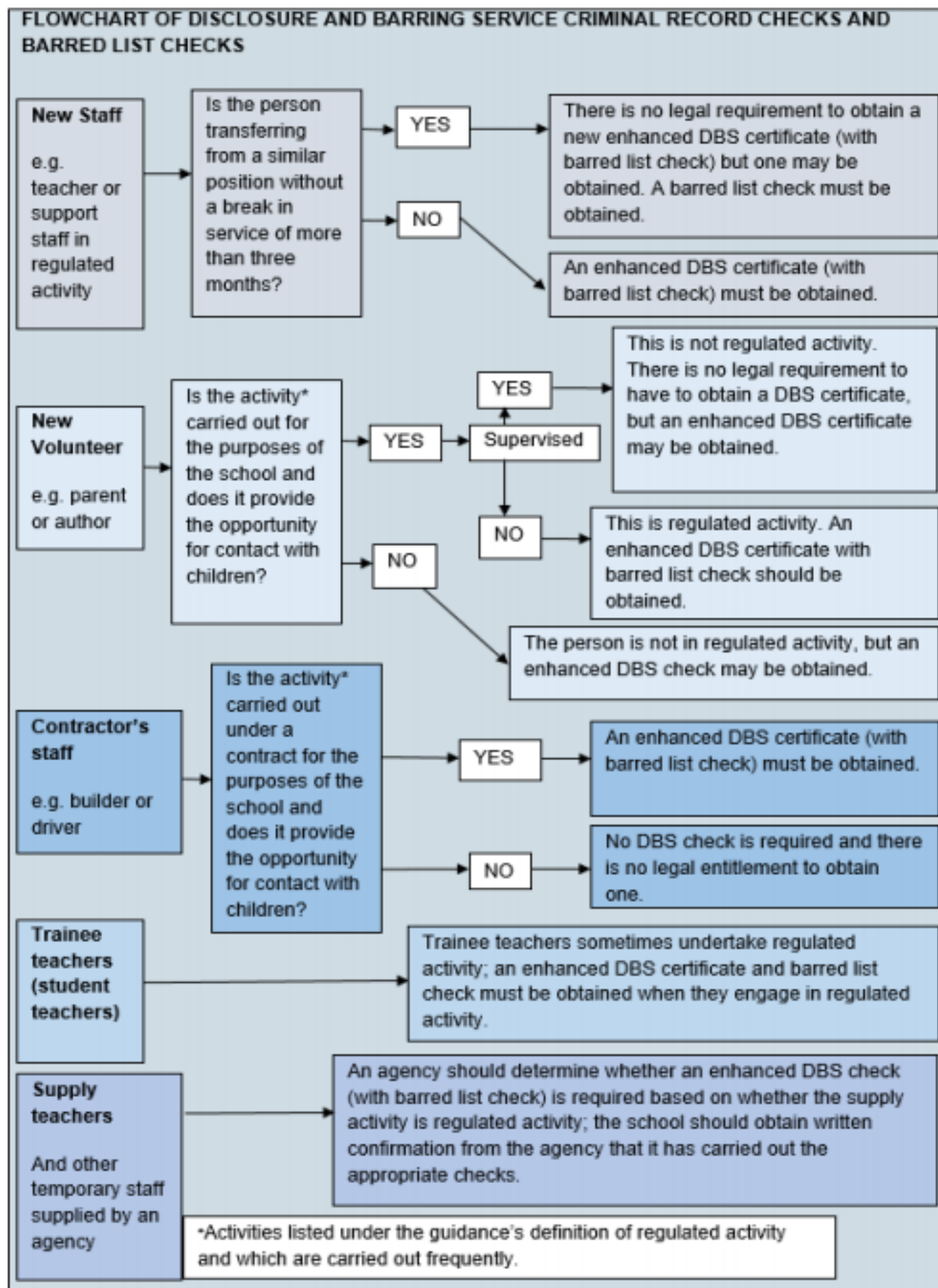
Annual Audits produced by the Designated Safeguarding Leads for School Committees in the spring term each year.



Appendix A Reporting of a concern flowchart



Appendix B Disclosure and Barring Service Criminal Record and Barring Checks

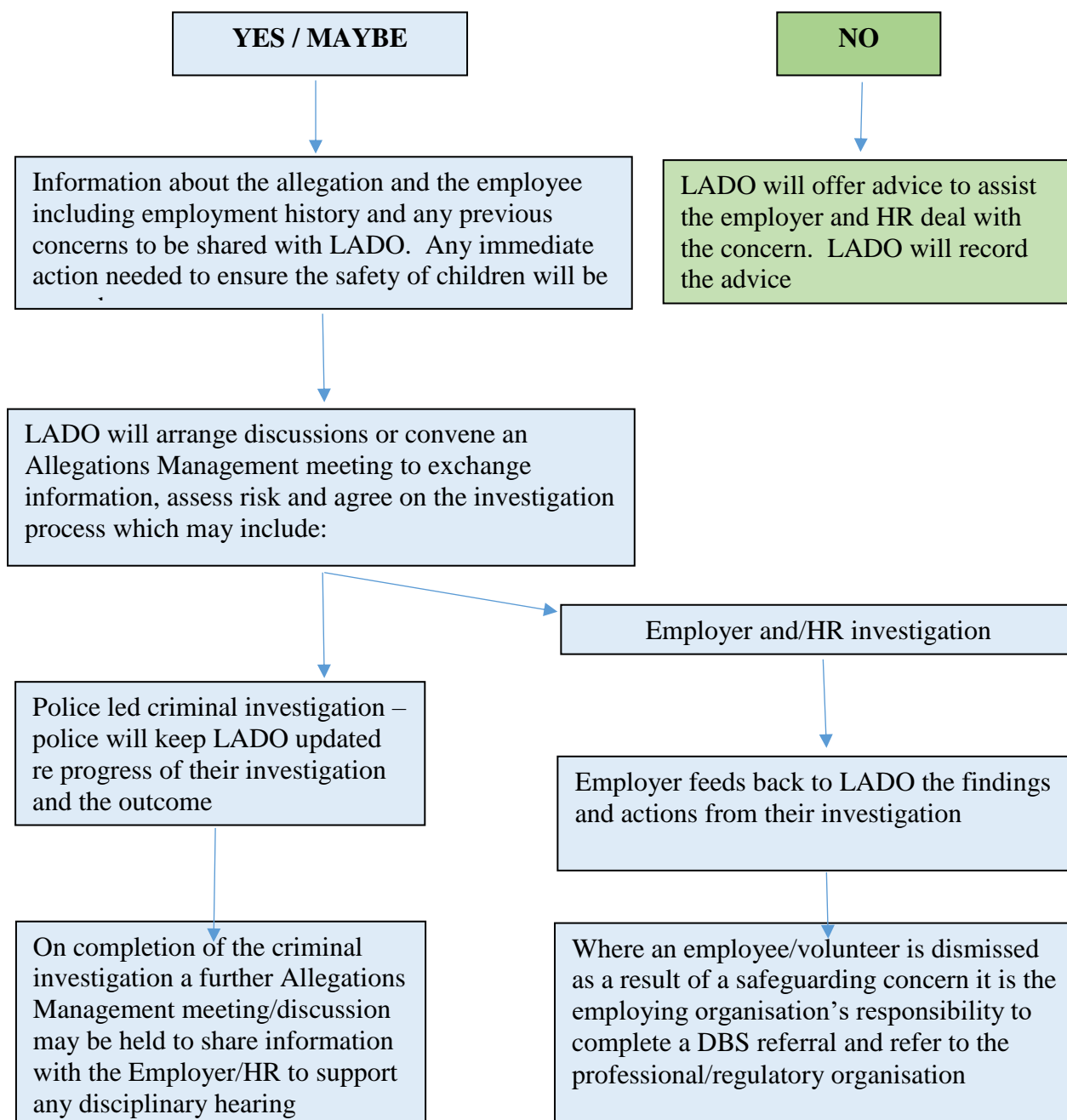




Appendix C LADO Process flowchart

LADO THRESHOLD (Working Together to Safeguard Children 2018 & KCSIE 2023)

- Behaved in a way that has harmed/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 (Working Together to Safeguard Children 2018)
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children





Appendix D Safer Recruitment Procedure [South Gloucestershire, Integra Schools HR, September 2023]

Introduction

Ensuring that safer recruitment guidance is clearly followed when recruiting school staff is the first step in safeguarding and promoting the welfare of children and young people. Schools must ensure they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in their settings.

This document provides guidance for Headteachers and school colleagues on safer recruitment responsibilities in the school and academy setting. Please contact your Integra HR Consultant for any clarification

Safer recruitment is one strand within the school's overall responsibility for safeguarding pupils and will be considered as part of the Ofsted inspection process. It is important to ensure that safeguarding considerations are an integral part of day-to-day management through selection procedures, induction, supervision, professional development and ensuring that the school culture allows any concerns to be shared and addressed in a timely and appropriate manner.

2. Roles and Responsibilities

The **Governing Body** should ensure that the school has effective policies and procedures in place for the recruitment of staff and volunteers, that are in accordance with legislation and DfE guidance.

The **Headteacher** should ensure that the school operates safer recruitment practices with appropriate checks on all staff and volunteers; and that the safeguarding and welfare of children and young people is considered at every stage of the recruitment process.

3. Safer recruitment training

It is a mandatory requirement under the School Staffing Regulations that at least one member of a school interview panel has completed approved safer recruitment training. The DfE document, 'Keeping Children Safe in Education', (KCSIE) annually updated, confirms this statutory requirement. However, regardless of the regulatory requirement, it is important that interview panels have a good understanding of safer recruitment principles to fulfil the school's safeguarding responsibilities at the recruitment stage.

We offer regular accredited safer recruitment training courses (and refresher courses) which are based on the statutory DfE guidance and ensures that participants are appropriately trained and updated in this statutory area.

4. Safer recruitment checklist

It is important that satisfactory and compliant safer recruitment practice involves thinking about and including safeguarding issues at all stages of the process – from planning and advertising through to appointment and induction. The main points are



summarised below, and a recruitment checklist is provided on our website. Care is needed when making short term and temporary appointments to cover vacancies or other circumstances which may arise at short notice. Unsuitable candidates may slip through where proper checks are compromised because of time pressures.

The key features of a safer recruitment process include:

- time to plan and prepare for the whole recruitment process
- advertising in the appropriate place and drawing attention to safeguarding requirements, including the need for an enhanced DBS check
- requiring all candidates to use a standard application form that provides full details of the applicant's employment history, including gaps in employment
- thorough scrutiny of application forms and letters to identify, and seek to resolve, any discrepancies, anomalies, or omissions. Any queries or concerns being followed up as appropriate
- seeking clarification on the (relevant) criminal background, or potential unsuitability of working with children, of shortlisted candidates
- obtaining at least two independent references which address any specific questions asked about the candidate's suitability for work with children and young people and following up any concerns. Consideration must also be given to the status and relevance of the referees nominated
- an interview including appropriate tasks that explore the candidate's suitability to work with children as part of the overall assessment. Any issues arising from the application or references should be fully explored with the candidate
- verifying the successful candidate's identity
- verifying any relevant qualification requirements
- verifying suitable medical fitness for the post
- verifying the right to work in the UK
- checking any barring or prohibition orders that may apply
- obtaining an enhanced DBS disclosure and confirming suitability
- including a structured induction process which clarifies safeguarding obligations and responsibilities

5. Advertising the post

All advertisements for posts in schools, wherever placed, should include the statement:

"The school is committed to safeguarding children and young people, and all staff and volunteers are expected to share this commitment. All postholders are subject to a satisfactory Disclosure and Barring Service (DBS) check. Some roles may need to comply with the Childcare Act 2006, and the Childcare (Disqualification) Regulations 2018, where additional disclosure of information will be required".

As a minimum, applicants should be supplied with the following:

- job description and person specification
- the school's child protection policy
- the selection procedure for the post
- an application form – must be fully completed by all applicants
- information on self-declaration and the recruitment of ex-offenders (for shortlisted candidates)



6. Shortlisting and references

Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. It is an offence for anyone who is barred from working with children or young people, to apply for a post working with them.

The self-declaration form should be sent to all those candidates who will be called for interview. This process should take place after shortlisting, to prevent unintentional bias occurring at the shortlisting stage. The self-declaration form is provided on our website.

Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. The link to this guidance is at the end of this document. Shortlisting of candidates should be conducted by at least two people, and the same two or more people should then proceed to form the interview panel.

Shortlisting of candidates will be against the person specification for the post, noting any issues to be followed up with the candidate if called for interview. References will be taken up before the interview, so that any queries or discrepancies can be discussed during the selection stage. References must be sought directly from the referee and no reference or testimonial provided by the candidate will be accepted. Referees should be contacted to clarify any content which is vague or where insufficient information is provided.

Reference requests to the current or previous employer should also seek:

- confirmation of the post held
- specific verifiable comments about performance history and conduct
- any current disciplinary action
- details of any concerns that relate to the safety and welfare of children
- the candidate's suitability to work with children and young people in this post

As part of the shortlisting process, schools should consider carrying out an online search as part of their due diligence on the shortlisted candidates (see para. 221 of KCSIE), who should be informed that online searches may be undertaken.

The issue of reviewing school privacy notices should be raised with your Data Protection Officer.

7. Pre-employment and identity checks

All candidates invited to interview at the school will be required to bring identification documentation with them, such as passport, birth certificate, driving licence etc, as proof of identity/eligibility to work in the UK, as required by the Immigration, Asylum and Nationality Act 2006, and DBS Code of Practice.

Where an academic or vocational qualification is required for the position, the candidate must be able to provide documentary evidence that they have obtained the appropriate qualification.



All offers of appointment will be conditional until the satisfactory completion of mandatory pre-employment checks on the individual. The school will:

- verify the candidate's identity and right to work in the UK. Identity checking guidelines can be found on the Government website – see reference sources in paragraph 20
- obtain (via the applicant) an enhanced DBS check (including children's barred list information for those who will be engaging in regulated activity)
- obtain a separate children's barred list check if an individual will start work in regulated activity before the DBS certificate is available
- ensure all shortlisted candidates have completed a criminal record self-declaration form disclosing any relevant convictions, and information which may affect their suitability to work with children
- verify the candidate's mental and physical fitness to carry out their work responsibilities. This can be carried out by a confidential pre-employment health questionnaire which will be undertaken by the occupational health provider. A successful job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role **once an offer of employment has been made**
- if the candidate has lived or worked outside of the UK, make any further checks the school feels appropriate which would include an overseas police check.

8. DBS disclosures and the Rehabilitation of Offenders Act

The Protection of Freedoms Act 2012 established the Disclosure and Barring Service (DBS) as the agency with prime responsibility for criminal records and safeguarding.

An Enhanced DBS check will be required for all school posts and means that the information requested is exempt from the limitations of the Rehabilitation of Offenders Act 1974 (Exceptions) Order, and relevant information for safeguarding purposes is provided.

Legislative changes mean that candidates are not required to provide details of protected cautions or convictions, and the DBS will apply a filtering process which will identify and remove protected convictions and cautions from the criminal record certificate issued to candidates. However, candidates should be aware that the police may disclose information about offences which have been subject to filtering if they believe the information is relevant to the school position applied for and ought to be disclosed.

The enhanced DBS certificate will include barring details where these are requested, provided that the position is deemed to be in 'regulated activity' (see section 9). Barring checks will not be provided for unregulated positions such as supervised volunteers or governors in maintained schools.

It is important that the school has sight of the original DBS certificate as soon as this is available and, having checked relevant details, makes the appropriate entry on the Single Central Record.

Under the DBS Code of Practice, DBS certificates should not be copied or retained on school files. The original document should be seen, and the content checked, but



it is only necessary to record the reference number and date for the purposes of the Single Central Record. The disclosure certificate should be retained by the candidate.

Schools may wish to encourage newly appointed staff to join the DBS update service for a small annual DBS fee. Subscription to the service enables future status checks to be carried out by employers to confirm that no new information has been added to the check since its issue. Schools using this service to view an individual's DBS check must still ensure they see the original certificate to ensure that it is still valid and appropriate for the children's workforce.

9. Regulated Activity

Most staff in a school who are working with children will be engaging in regulated activity and therefore an enhanced DBS check which includes children's barred list information will be required.

Specifically, a person will be engaging in regulated activity with children if their work includes:

- teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional, or educational well-being, or driving a vehicle only for children
- work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers

This work is regulated activity if done regularly (defined as being carried out frequently by the same person – more than 3 days in a period of 30 days, or overnight).

Some activities are always regarded as 'regulated activities', regardless of frequency, and whether or not they are supervised. This includes relevant personal care or health care provided by or under the supervision of a health care professional. Examples include helping a child with toileting or dressing where they are unable to do this alone to their age, illness, or disability.

DfE Statutory Guidance on regulated activity and supervision is available for further reference. See Annex E of Keeping Children Safe in Education 2023.

10. Who needs a DBS check?

The school is responsible for ensuring checks for their employees, or for volunteers (including governors) who have significant unsupervised involvement with children.

DBS checks on staff employed by an agency or third-party provider will normally be the responsibility of the employing organisation. However, where that organisation is providing staff who will work for the school (e.g., agency supply teachers) the agency must provide written confirmation of the checks carried out and the school/academy must retain this relevant evidence.



DBS checks on individuals employed by the Local Authority or other organisations (e.g., Health Authority, Ofsted) are not the responsibility of the school. However, the school should always seek confirmation of identity as part of its front office reception arrangements.

11. School Staff

It is a mandatory requirement for those taking up any school post to have an enhanced DBS disclosure. Once in post there is no mandatory requirement for a further DBS check unless there is a break of service of 3 months or longer. This does not apply to circumstances such as maternity leave or long-term sickness absence, where there is no break in service.

These are the minimum standards that must be in place and apply to all categories of school staff (i.e., teaching and support staff). This will include those employed by the school for extended day activities, where appropriate, and for any temporary or casual staff that the school chooses to employ.

Where a DBS certificate is not available at the start date it will be for the Headteacher to carry out a risk assessment having regard to other recruitment checks carried out and the requirements of the post. The DBS certificate must be obtained from the candidate as soon as practicable thereafter. Additional supervision arrangements should be put in place and the situation reviewed at regular intervals until the DBS certificate is seen and recorded. All other checks including a separate children's barred list check must be carried out.

12. Volunteers and Governors

It is not necessary for every adult who provides voluntary assistance within school to be subject to a DBS check, and this will depend on the nature of the activity and whether this involves unsupervised engagement with pupils. Where a volunteer supports activities with pupils which are supervised and attended by school staff who themselves are in regulated activity, there is no requirement for a DBS check to be undertaken. However, under no circumstances can a volunteer for whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. Barred list information must not be requested in relation to any person, including volunteers, who are not in, or seeking to engage in, regulated activity.

Whether or not the activity requires a DBS certificate, it is good practice to have a published protocol which is made available to all would-be volunteers. An example is shown on our website and may be modified to suit the school or academy's needs.

It is a statutory requirement for all current Governors to have an enhanced DBS certificate. A barred list check will not also be required unless they are also working in 'regulated' unsupervised activity, such as acting as an unsupervised volunteer.

The same DBS checking system is required for Governors and Trustees of academies. All members of a multi-academy Trust's main Board, as well as local



school Boards must have an enhanced DBS check. The DBS check for the Chair of Trustees must be carried out by the DfE.

13. Agency and 'third-party' staff, including lettings

Staff who are engaged to work for the school but are employed and paid by an agency or other 'third-party' provider will need to be DBS checked by their employing organisation. The school must obtain written confirmation that DBS and all other relevant employment checks have been carried out, the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

Agencies providing staff for schools are required to fulfil the same level of recruitment checks as for a school. Where an activity for children (e.g., nursery or after-school) is provided at the school but is managed and delivered by another organisation, an appropriate written agreement should be drawn up which clarifies the responsibilities of that organisation. In the context of safeguarding, the agreement should include clarification of employment responsibility, DBS and other pre-employment checks including child protection policy, the procedure for dealing with complaints etc. This will be particularly important if the school has commissioned the activity or is otherwise supporting it through publicity or common staff.

Schools may also offer lettings to adult groups for a range of sporting, social or educational activities. Such activities will not normally require the school to establish safeguarding protocols as part of the lettings' agreement. However, in the event of adult groups using school premises during pupil attendance times, appropriate access controls will need to be established.

14. Local Authority and other visiting staff

Schools receive visits from a range of Local Authority staff as well as those from other organisations such as the Health Authority, Ofsted, and universities. The school is not required to obtain or require sight of DBS certificates for visitors from these organisations. It is sufficient for the school to obtain written confirmation that relevant checks have been carried out and to confirm the identity of individuals attending the school. Any concerns should be followed up by contacting the relevant organisation.

DBS checks are **not** carried out on all Local Authority staff and not all posts are eligible for an enhanced DBS certificate. Staff such as Finance and HR Consultants may visit schools for specific purposes which will not involve interaction with pupils and the normal school reception and identity arrangements are appropriate for these visits.

There is a letter available, for your records, on our website, which confirms that checks for SGC Local Authority staff will have been undertaken.

15. Students

It is not necessary to conduct DBS checks on students from other schools who may undertake work experience visits or placements, and DBS checks are not, in any event, available for those under the age of 16. Supervision arrangements should be made accordingly.



In the case of students undertaking teacher training or other school-based development, the responsibility for undertaking DBS checks will normally lie with the university or training provider. Appropriate confirmation of checks should be obtained accordingly. Where the school has direct responsibility for teacher training, e.g., under the School Direct scheme, it will also have responsibility for DBS and other recruitment checks.

16. Contractors

A contractor is defined as 'a person contracted to provide occasional temporary services'. Examples of the services provided by contractors include repairs and maintenance activity, hygiene services and specialist sports coaching. Schools and academies should ensure that any contractor, or employee of a contractor, who is required to work at the school or academy has been subject to the appropriate level of DBS check. As noted previously, the school must obtain written confirmation that DBS and all other relevant employment checks have been carried out.

Contractors engaging in regulated activity will require an enhanced DBS check (including children's barred list information). Contractors not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, will require an enhanced DBS check (not including barred list information). For 'regular' contact, it is irrelevant whether the contractor works on a single site or across several sites.

Schools and academies are responsible for determining the appropriate level of supervision, depending on the circumstances. However, under no circumstances should a contractor who has had no checks conducted be allowed to work unsupervised or engage in regulated activity.

If a contractor working at a school or academy is self-employed, the school or academy should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account for enhanced disclosures.

As with all visitors, the identity of contractors and their staff should be checked on arrival at the school or academy.

17. Section 128 direction (Education and Skills Act 2008)

A section 128 direction prohibits or restricts an unsuitable person from taking part in the management of an independent school, including academies and free schools. Although section 128 applies specifically to independent schools, persons subject to a section 128 direction are also disqualified from holding or continuing to hold office as a governor of a maintained school.

Locally Managed Schools can check whether their governors are prohibited under section 128 by using the Teaching Regulation Agency's (TRA) employer access service. This contains a separate link for all section 128 barring directions including non-teaching appointments. Where a governor will also be engaging in regulated



activity, a DBS barred list check (for new appointments) will identify any section 128 direction.

18. Childcare Disqualification Declaration

Staff working in 'childcare provision', or who are concerned in the management of such provision should be asked to complete a declaration form provided by the school in relation to the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 ("the Regulations"). This is in relation to circumstances where the individual has a conviction which may result in them being barred from working with young children, defined as 'childcare'. Where one of the disqualification criteria is met, the individual may seek a waiver from Ofsted, which must be satisfactorily granted before the candidate may commence work.

The Regulations are applicable to staff who are employed or engaged to provide early years childcare (up to and including reception year), or later years childcare (above reception age and under the age of 8) in nursery, primary or secondary school settings, such as before or after school provision, or if they are directly involved in the management of such childcare. Schools and academies must take steps to ensure they are not knowingly employing a person who is disqualified under the regulations in connection with relevant childcare provision. They should ensure that relevant employees are aware of the Regulations, and the need to advise the school if their circumstances change. Schools must keep a record of those staff who are employed to work in, or manage childcare provision, and should record the date on which the information about disqualification was provided. This information may be kept as part of the Single Central Record, or as a separate record. Ofsted will check this as part of their routine school inspection process.

19. Single Central Record (SCR)

All schools are required to maintain a Single Central Record which lists all staff and other adults who regularly work at the school and confirms the pre-employment checks that have been carried out. This will include relevant volunteers and governors. The SCR is subject to scrutiny as part of the school's Ofsted inspection and will often be considered at an early stage in the inspection process. A well maintained and up to date SCR will make a positive contribution to the inspection findings.

There is no prescriptive format for the SCR, and it can be in either electronic or paper format. The SCR must be readily available in one place; it is not sufficient to have the relevant details held in separate HR records. Most schools use some form of spreadsheet that can be readily printed off and viewed for inspection purposes. It is recommended that schools keep a file which contains appropriate supporting documentation such as confirmatory letters from the Local Authority, supply agencies and other organisations regarding DBS checks. The file may also be a useful place to store other relevant documentation and guidance relating to safer recruitment topics.

The SCR must contain the names of all staff who are employed by the school plus other adults chosen by the school to undertake relevant activities e.g., volunteers or governors who are involved in pupil activities.



For each person listed, the SCR must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed, or certificate obtained:

- an identity check
- a children's barred list check
- an enhanced DBS check requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required
- a check to establish the person's right to work in the UK

An individual's details should be removed from the SCR once they no longer work at the school.

Schools may also add other information to the SCR as they see appropriate, e.g.

- whether relevant staff have been informed of their duty to disclose relevant information under the childcare disqualification regulations
- checks made on volunteers
- checks made on governors
- dates on which safeguarding and safer recruitment training was undertaken

Supply teachers (or other staff) who are provided and paid through an agency should be included on the SCR, but it is not necessary for the school to verify the individual checks carried out.

20. Reference sources

- DfE statutory guidance: Keeping Children Safe in Education 2023
[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/881007/Keeping-children-safe-in-education-2023.pdf)

This document is statutory guidance from the Department for Education issued under section 175 of the Education Act 2002. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. It should be read alongside other statutory guidance.

- Ministry of Justice guidance on the disclosure of criminal records
[Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/881007/Guidance-on-the-Rehabilitation-of-Offenders-Act-1974-and-the-Exceptions-Order-1975-GOV.UK.pdf)
- Working Together to Safeguard Children, updated 2018
[Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/881007/Working-Together-to-Safeguard-Children-2018.pdf)

This document is a guide to inter-agency working to safeguard and promote the welfare of children. The document provides a clear framework for local Children's Partnership boards to monitor the effectiveness of local services. All relevant professionals should read and follow this guidance so that they can respond to individual children's needs appropriately.



- Ofsted: Inspecting safeguarding in early years, education, and skills, updated 2022
[Inspecting safeguarding in early years, education and skills - GOV.UK \(www.gov.uk\)](https://www.gov.uk/inspecting-safeguarding-in-early-years-education-and-skills)

This guidance sets out the main points inspectors need to consider when inspecting safeguarding in early years, education, and skills settings. It is therefore a useful way of checking that the school is prepared for inspection.

- Disclosure and Barring Service: guidance for employers, updated December 2020
[DBS checks: guidance for employers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/db-checks-guidance-for-employers)

- DBS Code of Practice
[DBS code of practice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/db-code-of-practice)

- Safer Recruitment Consortium: guidance for safer working practices for those working with children and young people in education settings. February 2022
[Professional and Personnel Relationships \(cimpres.io\)](https://cimpres.io/professional-and-personnel-relationships)

This guidance provides practical advice to support schools and their staff in their safeguarding responsibilities. To be read and used in conjunction with the DfE statutory guidance: Keeping Children Safe in Education.

- Teacher status checks: information for employers. Updated June 2021
[Teacher status checks: information for employers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/teacher-status-checks-information-for-employers)

This is a free service to check the record of a teacher you are employing or considering employing.

- DBS guidance on offences which will never be filtered from a criminal record check
[List of offences that will never be filtered from a DBS certificate - GOV.UK \(www.gov.uk\)](https://www.gov.uk/list-of-offences-that-will-never-be-filtered-from-a-dbs-certificate)

- DBS ID checking guidelines
[DBS ID checking guidelines - GOV.UK \(www.gov.uk\)](https://www.gov.uk/db-id-checking-guidelines)

- An employer's guide to right to work checks
[Checking a job applicant's right to work - GOV.UK \(www.gov.uk\)](https://www.gov.uk/checking-a-job-applicant-s-right-to-work)



Appendix E Volunteers: a statement of expectations

This school welcomes the participation of parents, carers, and other volunteers in a range of activities which may contribute directly or indirectly to the learning, development, and wellbeing of our pupils. We value the time that volunteers give and their willingness to assist us in providing additional opportunities for pupils. We will seek to provide any necessary guidance or support which may assist this voluntary contribution.

As a school we also have a responsibility to ensure that our volunteers are aware of certain obligations placed upon them through undertaking activities within the school environment. This is necessary for the school to secure the safety and welfare of pupils and to meet safeguarding inspection requirements.

1. Volunteers must be willing to comply with school policies and procedures at all times, and must follow any instructions provided by the appropriate member(s) of staff
2. Volunteers must regard themselves as adult role models when undertaking school activities and ensure that their conduct is appropriate to the school setting
3. Volunteers have a right to expect respect and co-operation from any pupils that they may engage with. Any concerns about pupil behaviour should be referred to the relevant member(s) of staff
4. Volunteers must be mindful of confidentiality considerations and should not discuss or pass on information about individual pupils or internal school matters which they may receive or obtain while undertaking voluntary activities
5. Volunteers who undertake unsupervised activities involving pupils will be required to apply for an enhanced DBS disclosure

Positions in schools are exempt from the Rehabilitation of Offenders Act 1974 and this means that relevant past criminal convictions, including cautions or bind-overs must be declared (although amendments to the Exceptions Order 1975 (as amended) means that certain spent convictions and cautions are protected and are not disclosable).

If you have received a criminal conviction or caution at any time, then please refer to the DBS guidance and information available at: [DBS filtering guide](#) - GOV.UK (www.gov.uk)





The DBS certificate will be considered in confidence when assessing suitability for voluntary activities in the school.

The school is obliged to maintain a record of all adults who are subject to safeguarding checks, but this will not include details of any convictions. This record is kept on a confidential basis and is subject to inspection by Ofsted.

The Headteacher and Governing Body reserve the right to determine whether any volunteer should be refused permission to participate in or to continue to participate in appropriate activities where this is felt to be justified.

Thank you for your support
Headteacher.

Confirmation by volunteer

I confirm that I understand and accept the expectations set out above.

Name:

Signed:

Date: