



Safeguarding Policy

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Summary of changes and reviews

Version	Date	Summary of amendments	By
4.0	1 Sept 2024	New template received from Wishford and Hatherop policy created	SD
4.1	30/01/25	Change of DDSL roles update	SD
4.2	1 Sept 2025	Change of DSL and DDSL Roles.	NW



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SAFEGUARDING POLICY

Key Contact Information

Proprietor: Sam Antrobus sam.antrobus@wishford.co.uk 01249 479070

Designated member of governance with safeguarding responsibility:

Sam Antrobus sam.antrobus@wishford.co.uk 01249 479070

Designated Safeguarding Lead (DSL):

Nick Williams nick.williams@hatheropcastle.co.uk 01285 705955

Deputy Designated Safeguarding Lead (DDSL) and Designated Practitioner to take the lead in EYFS:

Ellie King ellie.king@hatheropcastle.co.uk 01285 750206

Designated Teacher for children in need including looked after children:

Nigel Reed nigel.reed@hatheropcastle.co.uk 01285 750206

SEND Co: Rose Tomlin rose.tomlin@hatheropcastle.co.uk 01285 750206

Mental Health Lead: Stuart Hughes stuart.hughes@hatheropcastle.co.uk 01285 750206

Deputy Designated Safeguarding Leads (DDSLs):

Sian Dawson sian.dawson@hatheropcastle.co.uk 01285 750206

Deputy Designated Safeguarding Lead and Out of Hours Boarding DSL:

Nigel Reed nigel.reed@hatheropcastle.co.uk 01285 750206

Headteacher: Nigel Reed nigel.reed@hatheropcastle.co.uk 01285 750206

Multi-Agency Safeguarding Hub (MASH): 01452 426565 (for both Urgent Concerns and for Practitioner Advice)

Out of Hours Duty Service: 01452 614194

Gloucestershire Local Authority Designated Officer (LADO): Nigel Hatten

Nigel.Hatten@gloucestershire.gov.uk 01452 426 994

GSCP Procedures Manual, including MASH Portal:

<https://www.proceduresonline.com/swcpp/gloucestershire/index.html#>

Local Authority Children's Social Services:

Community Social Worker for Cotswolds: 01452 328101

Cotswolds Early Help Coordinator: Karobi Hayden 01452 328104 or 07825 734587

Gloucestershire Family Information Service (Early Help) team helpdesk: 01452 427362

<http://search3.openobjects.com/kb5/gloucs/glosfamilies/home.page>

Support and advice about extremism: [ACT Early | Prevent radicalisation](#)

Other Local Safeguarding Partnership contacts (LCSP)

Police emergency: 999

Police Non-Emergency Team: Fairford and Lechlade Area: Dial 101, or contact PC Mark Weedon

Mark.Weedon@gloucestershire.pnn.police.uk 01452 907171

SO15 Counter Terrorism Intelligence Officer and Prevent Officers for Gloucestershire Constabulary: Joe Hank joseph.hanks@gloucestershire.pnn.police.uk and Wendy Heaton

wendy.heaton8187@gloucestershire.pnn.police.uk, direct dial 01452 752650. Prevent referrals through this website <https://www.gloucestershire.police.uk/advice/advice-and-information/t/prevent/prevent/>



Counter Terrorism Hotline: 0800 789 321

Prevent Home Office Helpline: counter.extremism@education.gsi.gov.uk 020 7340 7264

Local Prevent <http://educateagainsthate.com>

Channel Helpline: 020 7340 7264

NSPCC: for concerns about a child and reporting abuse in education [and for advice on protecting children with SEND](#) 0800 136 663 email help@nspcc.org.uk

Childline Helpline for those under 18 and under: 0800 1111

Samaritans: 116 123 jo@samritans.org

Whistleblowing (for staff who do not feel able to raise concerns regarding child protection failures internally) help@nspcc.org.uk 0800 028 0285 (8am - 8pm)

OFSTED (Safeguarding children) - 0300 123 4666 (Mon - Fri 8am - 5pm) Email: CIE@ofsted.gov.uk whistleblowing@ofsted.gov.uk

Disclosure and Barring Service - P.O Box 3961 Royal Wootton Bassett SN4 4HH Tel: 03000 200 190 email: customer.services@db.s.gov.uk

Teaching Regulation Agency (TRA) 020 7593 5393 misconduct.teacher@education.gov.uk. General enquiries 0370 000 2288

Independent Schools Inspectorate: email: concerns@isi.net 020 76000100

2. Policy Statement

This policy applies to Hatherop Castle which includes the EYFS setting. This policy is applicable to the whole school community, including all staff, teaching and non-teaching, Wishford personnel, volunteers, temporary and non-temporary supply/visiting staff and contractors working in the school and all pupils.

The proprietor will ensure that all staff and volunteers are aware of the new policy and are kept up to date as it is revised. The school continues to be responsible for the safeguarding of pupils placed in alternative provision and will satisfy itself that the placement meets the pupil's needs

Policy Consultation, Monitoring & Review

The school monitors and evaluates its Safeguarding policy and procedures through the following activities:



- Proprietor visits to the school
- Senior Leadership Team discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities e.g. sufficient account must be taken of the nature, age range and other significant features of the school, such as historical issues, in the provisions made for safeguarding
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team
- The Head reports on safeguarding to the Proprietor. A safeguarding committee, including the Proprietor, meets termly to review all aspects of safeguarding including policies and procedures. They receive a safeguarding report recording any training that has taken place and any outstanding training required and will also record all safeguarding activity that has taken place. It will not identify individual pupils.
- Regular review of parental concerns and parental questionnaires
- All staff undertake safeguarding training on a regular basis.

Regular review of parental concerns and parental questionnaires.

We also inform parents and carers about this policy when their children join our school and through our school newsletter.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction. In addition, all staff are provided with Part One and annex A or B as necessary of the statutory guidance ['Keeping Children Safe in Education'](#), DfE (2025).

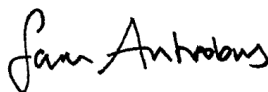
This policy will be reviewed in full by Wishford Governance on an annual basis. This policy was reviewed on 1st September 2025 to include changes to KCSIE. It is due for review for September 2026 or before if legislation changes.

Signed Headteacher:



Date: 1st September 2025

Chair of Wishford:



Date: 1st September 2025



3. Statement of Intent and Relevant Legislation

The safety, welfare and best interests of all our pupils are our highest priority. Our primary concern is to provide a secure and caring environment so that every pupil can learn in safety and we can act in their best interests. Parents/guardians have an important role in supporting our school. If necessary they should use this policy for concerns about the safety and/or welfare of children. Parents may contact ISI directly if they wish. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy.

The principles embedded in this policy link into other policies relating to: EYFS, Health and Safety, PHSEE, Relationship Education, Relationships and Sex Education (RSE), Anti-Bullying, Behaviour and Discipline, Equal Opportunities, Special Educational Needs and Disabilities, Attendance and children absent from education, Extremism, promoting British values, Female Genital Mutilation (FGM)) Educational visits, E-Safety, Whistleblowing, Safer Recruitment, Safer Working Practices. The list is not exhaustive.

This policy sets out how the proprietor is carrying out his statutory responsibility to safeguard and promote the welfare of children in accordance with and regard to any guidance issued by the Secretary of State contained and supplemented by the detailed procedures and practices of GSCP as part of the multi-agency safeguarding arrangements and the requirements of the Teacher Standards.

- 'Keeping Children Safe in Education DfE September 2025 (KCSIE) which incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018) and the non-statutory advice for practitioners: [What to do if you're worried a child is being abused – advice for practitioners](#) (March 2015)
- 'Working Together to Safeguard Children', DfE (December 2023) (WT) - the non-statutory advice [Information sharing](#) DfE (July 2018)
- What to do if you are worried a child is being abused (Mar 2015)
- Early Years Foundation stage (EYFS) Statutory Framework March 2021 – statutory guidance
- Gloucestershire Safeguarding Children Partnership Procedures and protocol: Allegations Against Persons Who Work With Children
 - Children Missing Education (September 2016) Statutory Guidance
 - Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (May 2019)
 - [Prevent Duty Guidance for England and Wales \(December 2023\): Departmental advice for schools and childcare providers](#) DfE (June 2015) The use of school media for on-line radicalisation (July 2015)
 - Children's Social Care National Framework (December 2023)
 - [ISSRs \(April 2024\) – statutory requirements](#)
 - [The Childcare Act 2006 \(August 2018\)](#)
 - Multi-Agency guidance on FGM (July 2020) [Mandatory Reporting of Female Genital Mutilation-procedural information](#) Home Office (December 2015)
 - [Sexual violence and sexual harassment between children in schools and colleges DfE \(September 2021\)](#)
 - [Child sexual exploitation: guide for practitioners DfE \(February 2017\)](#)
 - [Teaching online safety in school DfE \(June 2019\)](#)



- [Working together to improve school attendance \(February 2024\)](#)
- [Keeping children safe in and out of school settings \(Apr 2022\)](#)
- [Digital and technology standards in schools and colleges \(Mar 2023\)](#)
- [After school clubs, community activities and tuition \(September 2023\)](#)
- [Mental Health and Behaviour in Schools DfE \(September 2022\)](#)
- [Data protection: toolkit for schools DfE Data Protection guidance for schools](#)
- Promoting the education of children with a social worker (June 2021) (June 2021)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)

Our school prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting our school. Copies of this policy, together with our other policies relating to issues of child protection, including the staff code of conduct, are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the school. If necessary they should use this policy for concerns about the safety and/or welfare of children. Parents may contact ISI directly if they wish. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential and encouraged.

The principles embedded in this policy link into other policies relating to EYFS, Health and Safety, PHSEE, Relationship Education, Relationships and Sex Education (RSE), Anti-Bullying (Child Sexual Exploitation), Behaviour and Discipline, Equal Opportunities, Special Educational Needs and Disabilities, Confidentiality, Attendance and children absent from education, First Aid, Substance Misuse (including drugs and alcohol) , Racism and Homophobia, (including combating extremism, promoting British values, Female Genital Mutilation (FGM)) Educational visits, E-Safety, Attendance, Staff Code of Conduct, Whistleblowing, Safer Recruitment , Safer Working Practices and more.

The safety, welfare and best interests of all our pupils are our highest priority. Our primary concern is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety and we can act in their best interests. This policy sets out how the proprietor is carrying out his statutory responsibility to safeguard and promote the welfare of children in accordance with and regard to any guidance issued by the Secretary of State contained and supplemented by the detailed procedures and practices of Gloucestershire Safeguarding Children's Board (LSCP) as part of the multi-agency safeguarding arrangements and the requirements of the Teacher Standards.

- 'Keeping Children Safe in Education DfE September 2025 (KCSIE) which incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018) and the non-statutory advice for practitioners: [What to do if you're worried a child is being abused – advice for practitioners](#) (March 2015)
- 'Working Together to Safeguard Children', DfE (December 2023) (WT) - the non-statutory advice [Information sharing](#) DfE (July 2018)
- What to do if you are worried a child is being abused (Mar 2015)



- Early Years Foundation stage (EYFS) Statutory Framework January 2024 – statutory guidance https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf
- Gloucestershire Safeguarding Children Partnership Procedures and protocol: Allegations Against Persons Who Work With Children
- Children Missing Education (September 2016) Statutory Guidance
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (May 2019)
- [Prevent Duty Guidance for England and Wales \(December 2023\): Departmental advice for schools and childcare providers](#) DfE (June 2015) The use of school media for on-line radicalisation (July 2015)
- Children’s Social Care National Framework (December 2023)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(September 2021\)](#)
- [ISSRs \(April 2024\) – statutory requirements](#)
- [The Childcare Act 2006 \(August 2018\)](#)
- Multi-Agency guidance on FGM (July 2020) [Mandatory Reporting of Female Genital Mutilation-procedural information](#) Home Office (December 2015)
- [Sexual violence and sexual harassment between children in schools and colleges DfE \(September 2021\)](#)
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- [Data protection: toolkit for schools DfE Data Protection guidance for schools](#)
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- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)

4. Purpose and Aims

The purpose of Hatherop Castle School’s safeguarding Policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. This means we will always work to ensure our legal responsibility to safeguard and promote the welfare of all children and to:

- 4.1 Protect children and young people from maltreatment. Preventing impairment of children’s and young people’s mental and physical health or development. Ensure that children and young people grow up in circumstances consistent with the provision of safe and effective care: and take action to enable all children and young people at our school to have the best outcomes.



- 4.2 Our school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered pupils at our school. All members of staff have a duty to safeguard our pupils' welfare and will familiarise themselves and comply at all times with this policy. Staff are required to be alert to any possible concerns. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and multiple issues may overlap. Behaviours linked to drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. The elements of our policy are prevention, protection and support.
- 4.3 This policy will give clear direction to all staff including supply staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our school.
- 4.4 To ensure that all necessary internal and inter-agency child protection procedures are in place as required when children may be suffering or at risk of "significant harm". We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who have unexplained and/or persistent absences from education, particularly on repeat occasions. The Attendance Lead will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

5. Our Ethos

- 5.1 The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff at our school if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. The school promotes a positive, supportive and secure ethos, giving pupils a sense of being valued and providing an environment in which children can learn and develop. Children can be listened to through the listening ear service, posters for which are displayed around the school, through worry and whisper boxes, and through electronic concern forms on personal devices.
- 5.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at our school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child. We recognise that because of the day to day contact with children, staff in school are well placed to observe the signs of possible abuse and there need to be constantly vigilant.
- 5.3 The Proprietor will appoint a senior board level lead to take leadership and responsibility for the school's safeguarding arrangements.
- 5.4 At Hatherop Castle school we ensure that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development. We operate with the best interests of the child at their heart. It is important for children to receive the right help at the right time and **early help** is key to pupil wellbeing in order to address risks and prevent issues escalating. We must



not be guilty of: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to reassess concerns when the situation does not improve, sharing information too slowly and not challenging those who appear not to be taking action

- 5.5 This school recognises its responsibility to discuss with social care/Social Services, the Police and the three safeguarding partners any significant concerns about a child which may indicate:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child on child Abuse

In accordance with GSCP procedures these concerns cannot be kept confidential. This school also recognises its duty to work with other agencies in protecting children from harm and in responding to concerns about possible abuse, including the three safeguarding partners, Police, Child and Adolescent Mental Health Services, Education Welfare Service, Education Psychology Service and other agencies/services coming into school to support individual pupils/groups of pupils. Staff will be able to contribute to any assessment or meeting about the child held under GSCP and the three safeguarding partners procedures as required. To ensure we refer to the police immediately, where appropriate 'When to call the police': Guidance for schools and colleges is included in the NPCC guidance.

- 5.6 Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- 5.7 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.
- 5.8 Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online). The Relationships Education, Relationships and Sex Education and Health Education will cover relevant topics in an age and stage appropriate way, through a planned, developmental curriculum enabling pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources. Further information can be found in the DfE guidance ['Teaching online safety in school.'](#) and ['Relationships Education, Relationships and Sex Education and Health Education.'](#)

The PSHE, Teaching and Curriculum, and RSE policies can be referenced to evidence how our curriculum, and other provision, is used to achieve this as part of providing a broad and balanced curriculum.

- 5.9 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and the Gloucestershire Multi Agency Safeguarding Partnership arrangements.



5.10 Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse'. In the first instance if staff feel it is required it will be discussed with the DSL who will consider the appropriate action in accordance with the safeguarding partners threshold document.

As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child
- has a parent or carer in custody, or is affected by parental offending
- is frequently missing/goes missing from education, home or care

The school will support pupils in accordance with his/her agreed child protection plan as required. The school will notify any concerns or changes about a child who has a child protection plan or is known to have an allocated social worker to the child's social worker or in her/his absence the manager or a duty officer in the team. The school will inform the social worker of any decisions made in the best interests of the child's safety, welfare and educational outcomes. The school will co-operate with other agencies and the GCSP advice to act in the best interests of the child.

We recognise that children who are abused or who witness violence may experience difficulties which impact on their sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.

5.11 The school will provide support by:

- ensuring that the curriculum and ethos of the school support the child
- providing sufficient resources and time with regards to safeguarding and releasing staff in order that they can participate in safeguarding/child protection processes, core groups and meetings (especially child protection conferences and child in need meetings)
- ensuring that the attendance of any child subject to a child protection plan, or otherwise believed to be at risk of harm, is closely monitored
- including specific training to understand the particular safeguarding risks of looked after children during bi-annual school-based safeguarding training



- Supporting children who face educational barriers to learning such as poor attendance, learning difficulties, behaviour and mental health.

To ensure that all of our pupils receive equal protection, (in addition to the list above IN 2.10) we will give special consideration to children who are:

- missing education/missing from education
- looked After Children
- at risk of Fabricated or Induced Illness
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying including cyber, homophobic, racist etc
- live transient lifestyles
- LGBT (lesbian gay bisexual transgender)
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or
- do not have English as a first language

Statutory Guidance: [Promoting the education of looked after children](#).

6. Roles and Responsibilities

The School's Designated Safeguarding Leads are:

DSL: Mr Nick Williams nick.williams@hatheropcastle.co.uk 01285 705955

DDSL and EYFS Lead: Mrs Ellie King ellie.king@hatheropcastle.co.uk 01285 750 206

DDSL: Sian Dawson sian.dawson@hatheropcastle.co.uk 01285 750 206

DDSL and Out of Hours Boarding: Nigel Reed nigel.reed@hatheropcastle.co.uk 01285 750 206

DMHL: Mr Stuart Hughes stuart.hughes@hatheropcastle.co.uk 01285 750206

Headteacher: Nigel Reed nigel.reed@hatheropcastle.co.uk 01285 750206

Named Safeguarding Governance Lead: Sam Antrobus sam.antrobus@wishford.co.uk 01249 479070

The most recent Level 3 training:

Nick Williams in January 2025

Sian Dawson January 2025

Ellie King in January 2025

Nigel Reed in January 2025

Sian Dawson, Ellie King, and Nick Williams are on the Senior Leadership Team and are the direct link with the Headmaster and are held accountable by the Headmaster and SLT at weekly meetings.

There is a weekly Pastoral and Welfare meeting where Safeguarding and Early Help matters are discussed when appropriate. The DSL reports back to the headmaster in weekly SLT meetings and a weekly Pastoral Staff meeting enables information to be shared with staff and for staff to raise and discuss concerns. The DSL



is held accountable to Wishford Executive at a minimum of once a term in termly Safeguarding Committee Meetings.

It is the responsibility of *every* member of staff, volunteer and regular visitor to our school to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at this school. This includes the responsibility to provide a safe environment in which children can learn.

Governance

6.1 The Proprietor and the Director of Education & Compliance of Wishford Schools are accountable for ensuring the effectiveness of this policy and our compliance with it.

6.2 The Proprietor will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with Local Authority guidance and the requirements of the Gloucestershire Safeguarding Children Partnership policies and procedures;
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2018);
- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description.
- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the school's safeguarding response for those pupils who go missing from education as detailed section 6 of this policy.
- All staff (including the Head) undertake appropriate child protection training that is updated annually and on-line safety training;
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
- All staff understand the relevant data protection principles which allow them to share (and withhold) personal information
- Safer recruitment practices are followed in accordance with the requirements of [Keeping Children Safe in Education](#) DfE (2025);
- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

The Wishford personnel in attendance will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils. They will also receive an Annual Safeguarding Review at the Michaelmas Term meeting and details of all Inset training given by DSL.

The Headteacher

6.3 At Hatherop Castle School the Headteacher is responsible for:



- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL);
- Identifying alternate members of staff to act as the Designated Safeguarding Lead (DSL) in his/her absence to ensure there is always cover for the role;
- Ensuring that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise low level concerns about poor or unsafe practice and low level concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff or volunteer.
- Ensuring a Mental Health Lead is appointed

The Designated Safeguarding Lead (DSL)

- 6.4 The Designated Safeguarding Lead is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined [Keeping children safe in education - GOV.UK](https://www.gov.uk/government/consultations/keeping-children-safe-in-education).
- 6.5 The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in writing and given to the DSL.

During term time the designated safeguarding lead (or a deputy) should 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, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable. The DSL can always be contacted at Hatherop on the Safeguarding emails address and by direct line with call forwarding to personal mobile.

School's arrangements for any out of hours/out of term activities availability: Nigel Reed is the out of hours contact during term time and holidays, and in rotation with the DSL and DDSs if required during the holidays.

- 6.6 The DSL at Hatherop Castle School will represent our school at child protection conferences and core group meetings. Through appropriate training, knowledge and experience our DSL will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.
- 6.7 The DSL will be equipped to be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for these decisions. This will include instances where referrals were or were not made to another agency such as the local authority, children's social care or the prevent programme.
- 6.8 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained within the school to the agreed school's [safeguarding training pack](#) provided by Children's Services.
- 6.9 The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.



- 6.10 The DSL(s) will work with the headteacher and senior leaders, 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. This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.
- 6.11 We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure that staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting 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.

7. Induction and Training

All staff are recruited in accordance with the Safer Recruitment Policy. (See separate policy)

- 7.1 The Proprietor will ensure that all staff, both teaching and non-teaching, receive appropriate induction, prior to the start of term, and regular training to equip them to carry out their responsibilities for safeguarding and child protection effectively, as prescribed in government Guidance and in accordance with the expectations of the LSCP and the three safeguarding partners. All staff will receive the policies listed below before they commence work and will record they have read them and discussed them with the DSL

During their induction period within a week of joining the school, every new member of staff, supply staff, contractor or volunteer will receive safeguarding training. It includes:

- a review of the school's Safeguarding and Child Protection Policy and Compliance guidance including how to record and report safeguarding concerns;
- The role and identity of the DSL;
- A copy of Part 1 of KCSIE at least (or, for staff that do not work directly with children, Annex A as determined by Proprietor and Head)
- For school leaders and those who work directly with children Annex B of KCSIE (and Part 5 of KCSIE)
- The Behaviour Policy (including measures to prevent bullying, including cyber bullying, prejudiced based and discriminatory bullying;
- The staff code of conduct including the whistleblowing procedure;
- The safeguarding response to children who go absent from education – this information is included in section 10 of this policy;
- Mental Health Policy
- Acceptable use of IT including staff/pupil relationships and online safety; Please refer to the Mobile Technology Policy;
- Prevent training that extends to all staff;
- How to manage a report on sexual violence and sexual harassment in line with KCSIE 2025;



- acceptable use of communications and media.
- Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such a practice is suspected.

7.2 Every new member of staff or volunteer will receive safeguarding training during their induction period within the first half term of joining the school. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the identity and role of the Designated Safeguarding Lead (DSL). The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff also receive on-line safety training as part of the overarching safeguarding approach. This will include an understanding of the expectations, acceptable roles and responsibilities in relation to filtering and monitoring. The proprietor will consider the numbers and age range of their pupils, those who are potentially at risk of harm and how often they access the IT systems along with the proportionality of costs versus safeguarding risks. www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges. The filtering and monitoring systems will be reviewed at least annual by the proprietor and the school.

7.3 The proprietor also ensures that in addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of 'Keeping Children Safe in Education'. In order to achieve this, we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis and we will evaluate the impact of this training;
- all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;
- through the annual quiz which all staff complete to show their understanding
- through the use of TES Develop
- It will include online safety, and harmful sexual behaviours (including child on child abuse and sexual violence and sexual harassment) and Prevent Awareness training;
- The Proprietor will ensure that all members of the Governance team receive appropriate safeguarding and child protection training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. The training will be regularly updated.
- The Proprietor is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements. Under the Human Rights Act it is unlawful for a school to act in a way that is incompatible with the European Convention on Human Rights (ECHR). Being subjected to harassment, violence or abuse, including that of a sexual nature, may breach conventions as set out in the ECHR.



- 7.4 All regular visitors, temporary staff and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of whom our DSL and alternate staff members are and what the recording and reporting system is. (See Appendix 2).
- 7.5 The DSL, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Gloucestershire Safeguarding Children's Partnership at least once every three years. The DSL and DDSLs will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years. In addition to formal training, DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role. This is done through advanced safeguarding training, visits to Gloucestershire MASH, attendance at DSL cluster/forum meetings, national online updates from Andrew Hall and NSPCC.
- 7.6 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of '*Keeping Children Safe in Education*' (2024) provides links to guidance on specific safeguarding issues such as Child Sexual Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Norfolk Safeguarding Children Partnership
- 7.7 All staff sign to say that they have read and understood KCSIE Part 1 including Annex A and the school's Safeguarding and Child Protection policy at regular intervals or when new guidance is issued. All existing staff complete an annual update regarding their personal circumstances. (See also Induction of New Staff Policy)

8. Procedures for Managing Concerns

- 8.1 Hatherop Castle School adheres to child protection procedures that have been agreed locally through the Gloucestershire Safeguarding Children Partnership. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with Gloucestershire Local Assessment Protocol and the Gloucestershire Threshold Guidance.
- 8.2 Every member of staff including volunteers working with children at our school are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outline in this policy.
- 8.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 8.4 It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 8.5 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL so that appropriate agencies can be informed within 24 hours or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.



- 8.6 All concerns about a child or young person should be reported without delay and recorded in writing using the agreed system in the setting, by using CPOMS or using a written structure such as Annex D which will then be uploaded to CPOMS
- Records should include:
- a clear and comprehensive summary of the concern
 - details of how the concern was followed up and resolved
 - a note of any action taken, decisions reached and the outcome
 - On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.
- 8.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Gloucestershire Children's Advice & Duty Service (CADS) as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 8.8 All referrals will be made in line with Gloucestershire Children's Services procedures as outlined in Appendix A.
- 8.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Gloucestershire CADS immediately. Anybody can make a referral in these circumstances. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headteacher. Concerns should always lead to help for the child at some point.
- 8.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Gloucestershire CADS, or the police if:
- the situation is an emergency and the designated senior person, their alternate and the Headteacher are all unavailable;
 - they are convinced that a direct report is the only way to ensure the pupil's safety.
 - If it is suspected that a crime has been committed the matter will be referred to the police from the outset by the DSL.
 - In relation to our nursery/EYFS setting, the school will inform Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.
 - The school will inform Ofsted, within 14 days, of any significant event likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided.
- 8.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Headteacher or Mr Sam Antrobus (Wishford CEO). If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Gloucestershire CADS directly with their concerns.



9. Specific Safeguarding Issues (Including Bullying)

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

All incidences of bullying, including cyber-bullying and prejudice-based bullying will be recorded and reported and will be managed through our behaviour and tackling-bullying procedures. All pupils and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals in PSHE education and through assemblies and meetings. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Head and the DSL will consider implementing child protection procedures.

Bullying incidents including discriminatory and prejudicial behaviour e.g. racist, disability and homophobic bullying and use of derogatory language will be recorded and analysed. There will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

The anti-bullying policy is available on the school website.

Contextual safeguarding

At Hatherop Castle School we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school environment and/or can occur between children outside of the school. All staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

- 9.1 We recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training:
- 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
 - communication barriers and difficulties in overcoming these barriers.
 - (see also section on Children with SEND and disabilities or physical health).
- 9.2 At Hatherop Castle School we recognise that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.



Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence

Sexual exploitation of children is not limited by the age of consent and can occur up until the age of 18. It involves children being in situations, contexts or relationships where they (or a third person) receive 'something' as a result of them performing sexual activities. Child sexual exploitation can happen via technology without the child being aware; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability. CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

Characteristics of Child Sexual Exploitation and abuse. Children who:

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections or become pregnant;
- suffer from changes in emotional well-being;
- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education;
- stay away from certain people or avoid being alone with someone;
- display sexual behaviour that is inappropriate for their age;
- an unwillingness to remove clothes when changing for PE

It is often planned and systematic—people do not sexually abuse children by accident, though sexual abuse can be opportunistic; grooming the child—people who abuse children take care to choose a vulnerable child and often spend time making them dependent; grooming the child's environment—abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives

9.3 At Hatherop Castle School we train staff to recognise that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

9.4 At Hatherop Castle School we recognise that Child Sexual Exploitation is a form of child sexual abuse and this imbalance of power coerces, controls, manipulates or deceives a child or young person 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. Child sexual exploitation does not always include



physical contact, it can also occur through the use of technology. Some children may not realise they are being exploited and believe they are in a genuine romantic relationship. Further advice can be sought from the [Resources for education settings | CSA Centre](#) and [Preventing Child Sexual Exploitation | The Children's Society](#)

- 9.5 At Hatherop Castle School we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Indicators to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Children are increasingly being targeted and recruited using social media.
- 9.6 We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
- 9.7 At Hatherop Castle School staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. We make reference to the Home Office's [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information. These may indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs:
- Increased absence from school or children who go missing or regularly get home late;
 - 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 emotional wellbeing;
 - Children who misuse drugs and alcohol;
 - Signs of assault or unexplained injuries;
 - Unexplained gifts or new possessions.

If staff have concerns (as opposed to a child being in immediate danger) speak to DSL.

- 9.8 If a child is suspected to be at risk of or involved in county lines, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

So-called 'honour-based abuse (including Female Genital Mutilation and Forced Marriage

- 9.9 At Hatherop Castle School we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA, they



should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

- 9.10 Where FGM has taken place, [Section 5B of the Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to teachers on this requirement and further information on when and how to make a report can be found in the Home Office guidance: [Mandatory Reporting of Female Genital Mutilation- procedural information](#) (December 2015). Unless there is good reason not to, staff should consider discussing any such cases with the DSL and involve children's social services as appropriate.
- 9.11 At Hatherop Castle School we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact 020 7008 0151 or email fmufco.gov.uk

Preventing radicalisation and extremism

- 9.12 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. A risk assessment assessing the risk to children being drawn in to radicalisation is prepared and shared with staff. At Hatherop Castle School, we will ensure that:
- Through training, staff, volunteers and Wishford personnel have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
 - There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
 - The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
 - The DSL will make referrals in accordance with Gloucestershire Children's Partnership Channel Procedures and will represent our school at Channel meetings as required.
 - Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.

Child on child allegations and abuse including Child on child sexual violence and sexual harassment. The procedures are to be followed for all accusations and allegations

- 9.13 Child on child abuse is one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school and online. It can manifest itself in many ways and can include abuse within intimate partner relationships between peers. It can also



occur through a group of children sexually assaulting or sexually harassing a single child or group of children

9.14 At Hatherop Castle School all staff are trained so that they are aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence such as rape, assault by penetration and sexual assault;
- sexual harassment; such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- gender based issues
- upskirting; which typically involves taking pictures under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim;
- sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Sexting and consensual and non-consensual sharing of nudes and/or semi-nudes, and
- initiation/hazing type violence and rituals.

9.15 We recognise that children are vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, All staff and volunteers must remember the impact on both the victim of the abuse as well as focussing on the support for the child or young person exhibiting the harmful behaviour.

Sharing nudes and semi-nudes

- We understand that abuse can occur in intimate personal relationships between peers; and that consensual and non-consensual sharing of nudes and semi nudes images and or videos¹ (also known as sexting or youth produced sexual imagery) is a form of child on child abuse. ¹ UKCIS guidance: [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK](#). For this purpose, it means the sending or posting of nudes or semi-nude images, videos or live streams by children under the age of 18 online. It can be via social media (including Snapchat), gaming platforms, chat apps (e.g. WhatsApp) or online forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. It might happen publicly online, in 1-1 messaging or via group chats and/or via closed social media accounts. Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual



abuse' or 'sexting'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a 16 young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

9.16 For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

9.17 All members of staff in an education setting have a responsibility to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

9.18 Any direct disclosures by a child will be taken seriously and staff will ensure that the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma in them.

9.19 If staff become aware of any incidents they should notify the DSL immediately or as soon as possible.

9.20 The DSL will follow the DDMSC/UKIS guidance when reporting any incidents of nudes or semi-nudes sharing. This will include:

- Holding an initial review meeting with appropriate staff. This may include staff who heard the disclosure, the safeguarding team and the leadership team who deal with safeguarding including Wishford personnel.
- Carrying out interviews with the children involved (if appropriate)
- Informing parents and carers at an early stage unless there is good reason to believe that including them would put the child at risk of harm. Any such decision should be made in conjunction with other appropriate services such as children's social care or the police who will take the lead.
- Carrying out a risk assessment to determine whether there is a concern that the child has been harmed or is at risk of immediate harm. If not, the incident can be handled in school, in accordance with the sharing nudes guidance and the Safeguarding and Behaviour policies.
- If it is determined there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.
- All incidents will be recorded, whether they are referred externally or not with the reason for not referring externally written down signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of any images will be retained.
- If the incident involves an adult sharing images of children under 18 this constitutes sexual abuse and the DSL/Head should be notified immediately, who will inform the police.



We understand, that even if there are no reports in our setting it does not mean it is not happening, it may be the case that it is just not being reported. The school will ensure that children are aware of how they can report abuse and are aware of the procedures that the school will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and understood by children.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be a member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. Pupils may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not feel ready to make a direct report, and this may come from a friend or a conversation that is overheard. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Some pupils might not recognise their experiences as harmful. Staff are aware of this and will observe carefully, engage in general conversation and seek advice and take all the necessary measures to minimise risk to a pupil. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the three safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LSCEP and/or the police as appropriate. The School will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or DDSL) who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL {or DDSL} will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the LSCP referral process. Staff will challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, to avoid the risk of normalising such behaviours



Staff must never tolerate or dismiss concerns relating to child on child abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'Boys will be boys'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios create a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Hatherop Castle School recognises that children can be particularly vulnerable in residential settings and is alert to the risks of child-on-child abuse. Any safeguarding concern must be raised immediately with the Head of Boarding and/or the Designated Safeguarding Lead (DSL). Outside of core hours, concerns should be directed to the Deputy Designated Safeguarding Lead (DDSL), Mr Nigel Reed, the out of hours DDSL. As with all safeguarding matters at Hatherop Castle School, concerns will be considered by the DSL, recorded promptly on CPOMS, and appropriate action taken in line with statutory guidance.

In line with Keeping Children Safe in Education 2025 (KCSIE), pupils are made aware of external sources of confidential support [Home - Shore](#) offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours. Children at Hatherop Castle School can access this service at any time. The school will comply with its obligation as set out in the National Minimum Standards in relation to safeguarding at all times.

Sexual Violence and Sexual Harassment

All staff will be trained in managing a report on sexual violence both as part of induction and at regular intervals and will understand that they should follow our safeguarding procedures for reporting any concerns including child on child abuse. The DSL will respond to any concerns related to child on child abuse in line with guidance outlined in Part five of 'Keeping Children Safe in Education'. We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up. Effective safeguarding practice will be followed which includes:

- Not promising confidentiality;
- Reassure they are being taken seriously and never give the impression they are causing a problem nor should they feel ashamed by having their experience minimised;
- Making sure the victim understands the next steps; explain in a way that avoids alarming them that the law is in place to protect children rather than criticise them.
- Recognising that by disclosing the child has put the teacher in a position of trust;
- Listening carefully and not asking leading questions;
- Making notes (as long as it does not prevent you from remaining engaged with the child) and writing up the report as soon as possible and date it..
- Only record the facts as presented by the child;
- Being aware of searching, screening, confiscation and sexting advice for schools if the report includes an online element;
- Managing the reports with two members of staff present (1 preferably being the DSL or DDSL);
- Informing the DSL as soon as possible if they cannot be present.



The four likely scenarios for us to consider:

1. Manage Internally
2. Early Help
3. Referrals to children's social care
4. Reporting to the police

We will work with other agencies including the police and Children's Social Care and other services to safeguard and promote the welfare of children and protect them from harm, and as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the child(ren). Schools have a pivotal role to play in multi-agency safeguarding arrangements. The Proprietor will ensure that the school contributes to multi-agency work in line with the statutory guidance **Working Together to Safeguard Children** and to ensure the school understands their role in the safeguarding partner arrangements.

Safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. The school will make itself aware, through the DSL, of the published arrangements of who they will be working with and the expectations placed on any agencies and organisations by the local arrangements. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. We shall allow access for children's social care from the host local authority or, where appropriate, a placing local authority, to conduct or consider conducting a section 17 or a section 47 assessment.

Support will depend on the circumstances of each case and the needs of the child. If a report of this nature is made it may include completion of risk assessments by the DSL to support children (the victim, the alleged perpetrator and all the other children (and if appropriate staff) to remain in school and considers any actions to protect them from the alleged perpetrator(s) or future harm. Risk assessments will be recorded and kept under review. This risk assessment will not replace the detailed assessments of expert professionals. The DSL will engage with children's social care and specialist services as required. It will also consider delivery of early intervention and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a pupil discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Gloucestershire but the victim must live in Gloucestershire to access support. The SARC also has a 24/7 helpline 01603 276381 if pupils or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The wishes of the victim as to how to proceed will be considered as fully as is possible within the confines of this policy and the staff will act in the best interests of the child.

Modern Slavery

At Hatherop Castle School we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE



guidance [Modern slavery: how to identify and support victims](#) for concerns of this nature. for concerns of this nature.

10. Children Absent from Education - applies to whole school including EYFS.

(This includes the Safeguarding responses to children who go absent from education). This includes the KSCIE 2025 requirements for prolonged children absence.

Introduction

- 10.1 The welfare of all our children at Hatherop Castle School is our paramount responsibility. It takes full account of the child protection procedures agreed by GSCP and statutory guidance. A child who is absent from an education setting is a potential indicator of abuse and neglect, child sexual and/or criminal exploitation and county lines. It might indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risks of FGM, so called “honour” based abuse or risk of . At Hatherop Castle School will put in place appropriate safeguarding responses if children are absent from school. We will follow-up unexplained absences of any student with a telephone call from the school office on the morning of the first day of absence and priority will be given to vulnerable children especially those on a Child Protection Plan. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child being absent in the future. The designated safeguarding lead (DSL) will notify social services if there is an unexplained absence of more than two days of a student who is on the student safeguarding register. School name works within the guidelines of the safeguarding partners details and as such, access the services for Children Missing Education within the borough/County L.A. The school will follow their protocol to identify children absent from education. (See Appendix 1) This applies to all starters and leavers at non-standard transition points. Any changes to our admission register will trigger notification to our Single Point of Contact (SPOC) at L.A Welfare Service.

The school will view absence as both a safeguarding issue and an educational issue. Termly Persistent Absence data i.e Head's percentage of acceptable attendances % or below will be reported to our SPOC, name of contact at LA, at County/ borough etc Education Welfare Service. The school secretary (Jill Freebury) will also inform him/her of any student who has been absent without the school's permission for 10 continuous school days. Additionally, the school secretary will notify insert above person's name of any student who is going to be deleted from the admissions register where the student:

- has been taken out of school by his/her parents and is being educated outside the school system e.g. elective home education; has ceased to attend School name and no longer lives within reasonable distance;
- If the child has an EHC plan the school will notify the LA who should review the plan and work closely with parents and carers
- has been permanently excluded;
- has been removed from the admissions register at non-standard transitions i.e. where a child leaves School name before completing Year 8

- 10.2 At Hatherop Castle School all staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going



missing in future. This school has in place the means to monitor potential safeguarding risks through its checking and administration procedures.

- 10.3 At Hatherop Castle School we adhere to the procedures and processes outlined in the group's attendance policy and the school's attendance procedure and improvement plan to ensure there is an appropriate safeguarding response to children who are absent from education.

11. Mental Health

The school has an important role to play in supporting the mental health and wellbeing of its pupils.

- 11.1 At Hatherop Castle School all staff are made aware, through training, that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. We aim to prevent problems by promoting resilience as part of the whole school approach to social and emotional wellbeing.
- 11.2 Staff are aware of how children's experiences can impact on their mental health, behaviour, attendance and progress at school.
- 11.3 We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences, can impact on their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a child that is *also* a safeguarding concern, they should take immediate action by passing the information on to a Designated Safeguarding Lead.
- 11.4 At Hatherop Castle School have a named Mental Health Lead Stuart Hughes. There are clear systems and processes in place for identifying possible mental health problems, working with other agencies and accessing resources, as required to respond to these concerns. We refer to the Mental Health and Behaviour in Schools' DfE guidance for further support.

12. Online Safety

12. 1 At Hatherop Castle School all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.
- 12.2 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered, We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.



- 12.3 More details can be found in our policies on Online Safety, E-Safety and Mobile and Smart Technology which consider the 4Cs, content, contact, conduct and commerce. These policies include details on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. We will ensure internet filters are in place as well as appropriate monitoring systems to safeguard children from potentially harmful and inappropriate material online when using the school's IT system, without unreasonably impacting teaching and learning. This includes consensually and/or non-consensually sharing indecent images, sexually harassing their peers via mobile and smart technology, and viewing and sharing pornography and other harmful content whilst at school undetected. We will ensure our pupils are educated in online safety.
- 12.4 The DSL is responsible for the Online Safety of the children and the understanding of the filtering and monitoring systems and processes the school has in place and relays any online safety breaches and filtering issues to the Wishford IT Team. The school recognises that children have unlimited access to the internet via mobile phone networks. The use of such devices is fully outlined in the Mobile Phone and Camera Policy and IT Policy. The Wishford IT Team are always available to discuss and oversee our internet safety and use Sisco Meraki group filtering with additional white and black listings and Censornet. However, the school and the DSL are ultimately responsible for ensuring safe filtering and computer usage.
- 12.5 At Hatherop Castle School we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, including filtering and monitoring, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting.

Cybercrime

We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

If there are concerns about a child and cybercrime, the DSL will consider a referral to the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Further advice is available from Cyber Choices, 'NPCC- When to call the Police' and [How to contact the National Cyber Security Centre - NCSC.GOV.UK](https://www.ncsc.gov.uk)

The [Online Safety Act - GOV.UK](https://www.gov.uk) came into force in July 2025 and all Wishford schools and DSLs ensure that they are compliant with the legislation. In particular, staff and pupils will be made aware of the new offences listed in the act, namely:

- Cyberflashing
- Epilepsy trolling
- Threatening communications
- Encouraging self-harm
- Sharing intimate images (without consent, including deepfakes)



In addition, KCSIE 2025 outlines the potential harms inherent within the growing use of AI in schools. These include:

- Disinformation, bias and discrimination

Lack of an ethical framework and regulation

- Data protection and privacy issues
- Sexual abuse of children, including through AI generated images
- Cybercrime and fraud

As a result, schools will manage and monitor their use of AI carefully and report concerns and seek advice, whenever necessary, to the relevant members of the Wishford governance team. The ethical and reliable use of AI should form part of each school's online safety curriculum. Misinformation, disinformation and conspiracy theories

Misinformation, disinformation (including fake news) and conspiracy theories has been introduced as a new potential harm to children in KCSIE 2025. DSLs will work with pastoral and PSHE leads to ensure that such opinions are challenged and discussed whenever they arise and that awareness of such issues is included in the online safety/PSHE curriculum. Support and advice for delivering this content is available at [Combatting Extremism and Conspiracy Theories in the Classroom - Educate Against Hate](#) and the Pears Foundation - [Commission into Countering Online Conspiracies in Schools](#)

13. Pupils with Special Educational Needs, Disabilities and Physical Health issues

13. 1 At Hatherop Castle School recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting an incident because of their vulnerability, disability, cognitive understanding (knowing fact from fiction in online content) sex, ethnicity and/or sexual orientation.
- Repeating the content or behaviours seen and not understanding the consequences.

1. We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Additional support can be found at on the link: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](#)

13.2 At Hatherop Castle School we also recognise that pupils who attend Alternative Provision will often have complex needs and due to this we are aware of the additional risk of harm these children may be vulnerable to. The group's safer recruitment policy (2025) recognises the new KCSIE requirements in relation to our schools' communication with alternative settings.



13.3 Sexual violence and sexual harassment can be between two children or a group of children. All staff should be aware of the associated risks and understand the measures in place to manage any serious violence incidents.

- Both sexes may be affected although girls are more likely to be the victims of sexual violence and boys are more likely to be perpetrators of sexual harassment, this is not always the case. Such child on child abuse can be same gender based i.e boys/boys or girls/girls.
- Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent.
- When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered

14. Records and Information Sharing

14.1 If staff are concerned about the welfare or safety of any child at our school, they will record their concern through the setting's electronic system CPOMS. Any concerns should be passed to the DSL without delay.

14.2 Any information recorded will be kept in a separate named file, in a secure cabinet if a paper system is used and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within school on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential. All records will be retained at least until the accused has reached normal pension age or for a period of ten years, whichever is longer.

14.3 Child protection information will be kept up to date. Each concern logged will include:

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

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file whether an electronic or paper system is used. All our safeguarding records will include; a chronology, contents, front cover and will record significant events in the child's life.

14.4 When a child leaves our school, (including in year transfers) the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be within 5 days for an in-year transfer or within the first 5 days of the start of a new term. We recognise that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.

14.5 We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.



- 14.6 Prior to a child leaving we will consider if it would be appropriate to share any additional information with the new school or college in advance to help them put in place the right support to safeguard this child.
- 14.7 Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns to Gloucestershire County Council.

15. Working with Parents and Carers

- 15.1 Hatherop Castle School is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area
- 15.2 When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact GSCP, Children's Advice & Duty Service.
- 15.3 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.
- 15.4 We will seek to share with parents any concerns we have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to GSCP in those circumstances where it is appropriate to do so.
- 15.5 In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:
- Full names and contact details of all adults with whom the child normally lives;
 - Full names and contact details of all persons with parental responsibility (if different from above);
 - Emergency contact details (if different from above);
 - Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The School will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details in writing.

At Hatherop Castle School; we are working in partnership with Gloucestershire Constabulary and Gloucestershire's Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. In order to achieve this, Gloucestershire Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our pupils has been present with the Designated Safeguarding Lead. On receipt of any information, the Designated Safeguarding Lead will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance



with the 'Gloucestershire [Joint Agency Protocol for Domestic Abuse – Notifications to Schools](#)'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

16. Child Protection Conferences

- 16.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.
- 16.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the school in respect of individual children. Usually the person representing the school at these meetings will be the Headteacher or DSL. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.
- 16.3 All reports for child protection conferences will be prepared in advance using the guidance provided by the Gloucestershire Safeguarding Children Partnership. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at school. In order to complete such reports, all relevant information will be sought from staff working with the child in school.
- 16.4 Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

17. Safer Recruitment – Please see Safer Recruitment Policy

18. Safer Working Practice

18.1 All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

18.2 All staff will be provided with a copy of our school's code of conduct at induction. They will be expected to know our school's Code of Conduct and carry out their duties in accordance with this advice. A list of staff that have accessed positive handling training will be kept. If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors should have a clear glass panel in them and, ideally, be left open.

18.3 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in ['Guidance for Safer Working Practices for Adults who work with](#)



[Children and Young People in Education Settings'](#) (May 2019). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

19. Managing Allegations against staff (Including supply staff) Contractors and Volunteers

Allegations that may meet the harm threshold

19 The school treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. We provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. The school's procedures for managing allegations against all adults who are working in the school whether in a paid or unpaid capacity follows DfE statutory guidance and LSCP arrangements.

19.1 Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in *'Working Together to Safeguard Children'* (2023) and *'Keeping Children Safe in Education'*, DfE (2025) below. An allegation may relate to a person who works/volunteers with children who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The 4th bullet point above recognises circumstances where a member of staff (including supply teachers, contractors or volunteers) is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

19.2 At Hatherop Castle School we recognise our responsibility to report / refer allegations or behaviours of concern and / or harm to children by adults in positions of trust who are not employed by the School to the LADO service directly at Nigel.Hatten@gloucestershire.gov.uk. These are adults such as those in the voluntary sector, taxi drivers, escorts, and fosters carers.

19.3 We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in the local protocol [Allegations Against Persons who Work with Children](#) and Part 4 of *'Keeping Children Safe in Education'*, DfE (2025) are adhered to and will seek appropriate advice. The first point of contact for schools regarding concerns and/ or allegation issues (including for supply teachers) is via the Local Authority Education Duty Desk on 01452 614 194. A Duty Advisor (not a LADO) will give advice and guidance on next steps. If a teacher or member of staff has concerns, not



safeguarding related, about the behaviour of another member of staff towards a pupil, he or she should report it at once to the DSL (or to the Proprietor where the concern relates to the DSL or Head). If there are safeguarding concerns then the procedures at below should be followed. Any concern will be thoroughly investigated under the school's whistleblowing procedures. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body where the circumstances justify it. For more information see our Whistleblowing Policy. Staff may also raise issues directly with the Wishford team by contacting the Proprietor or anonymously using the Wishford website: www.wishford.co.uk/whistleblowing

- 19.4 School may receive allegations relating to an incident that happened when an individual or organisation was using the premises. We will follow our safeguarding policy and procedures including informing the LADO.
- 19.5 If an allegation is made or information is received about any adult who works/volunteers in our setting which indicates that they may be unsuitable to work/volunteer with children, the member of staff receiving the information should inform the Headteacher immediately. This includes concerns relating to agency and supply staff, contractors and volunteers. Should an allegation be made against the Headteacher, this will be reported to the Proprietor of Wishford Schools without the Head being informed. In the event that neither the Headteacher nor Proprietor is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Safeguarding governor for Wishford Schools. Allegations against the proprietor should be referred directly to the LADO.

The school aims to ensure there is a culture of safety and raising concerns and an attitude of "It could happen here". You must whistleblow on anyone who puts children at risk or if staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding systems. It is your duty. Whistleblowing@ofsted.gov.uk

Phone this number: On Duty Referrals 03330 139797

- 19.6 The Headteacher or Proprietor (case manager) will seek advice from the LADO within one working day. No member of staff or Wishford personnel will undertake further investigations before receiving advice from the LADO, or prior to the outcomes of an external investigation

The arrangements agreed upon will include informing the parents and seeking their consent for any immediate medical examination if necessary.

The member of staff against whom an allegation has been made would normally be informed as soon as possible after the result of the initial investigation is known, or the decision is made to dispense with one, but not invited to make a response. There should be a warning that anything said will be recorded. The case manager will give careful consideration as to whether the staff member should be suspended or alternative arrangements put in place which might include:

- Redeployment within the school with no direct contact with the child(ren) involved;
- Providing an assistant to be present where the individual has contact with children;
- Redeployment to alternative work in the school with no unsupervised access to children;



- Moving the child(ren) to alternative classes with no contact with the member of staff. (this action should only be taken if it is in the best interests of the child(ren) and is made clear it is not a punishment.
- Temporarily redeploy the member of staff to a different location e.g an alternative school.

If it is established that the allegation is not well founded, either on the basis of the medical evidence or further statements, then the person against whom the complaint has been made would normally be informed that the matter is closed. The complainant and the parents would also need to be informed of this.

If the Police decide to take the case further and the allegation is against a member of staff, he/she would normally be suspended or, where the circumstances are considered to warrant it, dismissed. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff the matter will be dealt with in accordance with the Disciplinary Procedure.

If the abuse is alleged or suspected to have been carried out by a pupil the above procedures will be followed, but in addition the Head must be immediately informed. The Head will follow the procedures set out in the Anti-Bullying Policy and, where appropriate, take advice from the Social Services team in determining what action to take.

During the course of the investigation the school in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

- 19.7 When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the school is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. In order to achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the School will usually take the lead in conducting an investigation as we have direct access to any affected children and other school staff to collect the facts.
- 19.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Proprietor should contact the LADO directly via email to nigel.hatten@gloucestershire.gov.uk
- 19.9 Further [information and guidance documents in relation to the LADO process](#), forms, leaflets and the Allegations against Persons who Work/Volunteer with Children Procedures are found on the [Gloucestershire Safeguarding Children Partnership | Gloucestershire Safeguarding Children's Partnership](#) Safeguarding Children Partnership website. Further national guidance can be found at: [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.
- 19.10 The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The School must also consider whether to refer the case to the



Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first.

The following definitions should be used when determining and recording the outcomes of allegations

- Substantiated
- Malicious (if this is found to be the case, no records will be kept on file)
- False
- Unsubstantiated
- Unfounded (this is the new category to reflect cases where there is no evidence or proper basis which supports the allegation)

In all circumstances (other than malicious) a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

At the conclusion of any case we will review our procedures to determine whether there are any improvements or changes to be made.

Concerns and Allegations that do not meet the harm threshold will be dealt with using the school's Low Level Concerns Policy

19.11 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. As part of the 'low level' concern process school may consult with the Local Authority Education Duty Desk on 01452 614 194. At Hatherop Castle School we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

19.12 We have a policy which sets out what low level concerns are, the importance of sharing these appropriately, how the setting addresses unprofessional behaviour and supports the individual to correct it at an early stage. This includes when staff should self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Please see [Low-Level Concerns Policy A12](#).

19.13 At Hatherop Castle School we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely and maintained by only one person; the Head Nigel Reed. We will review the records we hold to identify potential patterns and take action. This could be through a disciplinary process but also by referring to the Local Authority Education Duty Desk on 01452 614 194. Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.

19.14 We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor



performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

- 19.15 Staff Neutral Notification has been added to the school's low level concerns policy. See the low level concerns policy here: [Low-Level Concerns Policy A12.](#)

20. Use of premises for non-school/college activities

14. Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe.
15. We will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
16. In the event of the Designated Safeguarding Lead not being in school for any reason, any member of staff who has concerns about any child should contact the Deputy Safeguarding Lead. The Designated Safeguarding Lead should be informed as soon as possible. If he/she is unavailable the Proprietor (or his representative) will take on the Designated Safeguarding Lead's role and will continue to deal with concerns until the Designated Safeguarding Lead returns to School. In the unlikely event of there being no Designated Safeguarding Leads in school, a senior member of staff will be designated as a temporary Safeguarding Officer.
17. [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK \(www.gov.uk\)](#)

21. Relevant Policies

- 21.1 To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded the following policies are also included under our safeguarding umbrella:
- Staff Code of Conduct
 - Low Level Concerns
 - Anti-Bullying
 - Behaviour which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - Recruitment & Selection (which adheres to Part 3 of ['Keeping Children Safe in Education'](#).)
 - Whistleblowing (Full policy included in safeguarding and child protection policy)
 - Attendance
 - Online Safety
 - Health and Safety including site security
 - Harassment and discrimination including racial abuse
 - Meeting the needs of pupils with medical conditions
 - Intimate Care
 - First aid



- Educational visits including overnight stays
- RSHE

22. Educating children about safeguarding

Please also see PSHE/RSE policies and Online Safety in Wishford IT policy

- 22.1 We raise the awareness of children and equip them with the skills and knowledge needed to keep safe by covering relevant issues through Relationships Education and Relationships and Sex Education and/or through Personal, Social, Health and Economic (PSHE) education. We acknowledge that the Government has made regulations which make the subjects of Relationships Education (for all primary schools) and Relationships and Sex Education (for all secondary schools) mandatory and have regard for the DfE's statutory guidance: *Relationships Education, Relationships and Sex Education (RSE) and Health Education*.
- 22.2 The PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse. We also ensure that children know that there are adults in the school whom they can approach if they have a concern. It also covers staying safe online, cyber and homophobic bullying and teaches pupils about the risk of radicalisation.
- 22.3 Through the curriculum and pastoral systems, all staff will raise pupils' awareness and build their confidence and resilience so that they have a range of contacts and strategies to ensure their own protection and that of others, recognising that pupils need opportunities to develop the skills they need to stay safe from harm. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is age appropriate to all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy, including the dangers of Radicalisation.

Photos and cameras

- 22.3 The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

To protect all pupils, including those in EYFS, we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- not use pupils full name with an image
- ensure pupils are appropriately dressed
- ensure that personal data is not shared
- store images appropriately, securely and for no longer than necessary
- only use school equipment, i.e. not personal devices
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- In the EYFS personal cameras and phones will be locked away during the day.



- When choosing photographs for the website, we are mindful of the way children may appear in them, and will not include images which are in any way inappropriate.

23. Promoting and Raising Awareness

- 23.1 The diagram on page 55 indicates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. **Anybody can make a referral** and everyone has a responsibility to know how to. Staff should never assume that somebody else will take action and share all information that might be critical in keeping a child safe. If staff make a referral they should inform the DSL as soon as possible that a referral has been made.
- 23.2 Through the curriculum and pastoral systems, all staff will raise pupils' awareness and build their confidence and resilience so that they have a range of contacts and strategies to ensure their own protection and that of others, recognising that pupils need opportunities to develop the skills they need to stay safe from harm. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is age appropriate to all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy, including the dangers of Radicalisation.
- 23.3 Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and Religious Studies lessons are used to promote tolerance and mutual respect and understanding.
- 23.4 All pupils know that there are adults to whom they can turn to if they are worried. If the school has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:
- All pupils have access to a telephone helpline enabling them to call for support in private.
 - Every child has identified teachers to whom they can talk, and knows where to access the telephone numbers of Childline and Samaritans.
 - Posters with advice on where pupils can seek help.
 - We provide regular lessons to pupils for Internet and online safety (including when children are at home) as an integral part of the computing curriculum and ensure that all pupils understand and adhere to the school's guidelines in this area. For more details on cyber-bullying please refer to the school's anti-bullying policy.
 - We cover relevant issues through Relationships Education and Relationships and Sex Education and through Personal, Social, Health and Economic (PSHE) education.

Sharing information or images with other agencies, on the website or in the press

- 23.5 The school may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. We operate the following policy regarding the use of photographs, to ensure the privacy and safety of children at the school: where a child is named, no photograph of that child is displayed; where a photograph is used which shows a child, no name is displayed and where children are named, only their first names are given.



- 23.6 The school follows a policy of seeking parents' permission before using images which show children on the website or in the local press. The list showing pupils who are barred from appearing in the press, or on the website, is kept with admissions and is available whenever photographers are present. No private information about children is ever published on the website. By observing these points, this school ensures that visitors to the website cannot link images of children to names of children. When choosing photographs for the website, we are mindful of the way children may appear in them, and will not include images which are in any way inappropriate.

24. Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in a position of trust in relation to the young people in their care which they have a public duty to maintain by keeping them safe. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

25. Complaints Procedure

Copies of the School's Complaints Procedure can be sent to any parent on request. Any complaint arising from the implementation of this policy will be considered under the School's Complaints Procedure.

26. Off Site Visits

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

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

Safeguarding concerns or allegations will be responded to following the local procedures. The member of staff in charge of the visit will report any safeguarding concerns to the Designated Safeguarding Lead, who will pass to Social Care if appropriate. In an emergency the staff member in charge will contact the police and/or social care.

Staff accompanying overnight trips will receive updated safeguarding training before they depart, and will take part in a de-brief meeting with the DSL following their return, so that they may have an opportunity to discuss any safeguarding concerns they may have had or any required changes to safeguarding policy and procedure.

The Educational Trips Policy should be read for further details. As a school we do not undertake exchange visits.

27. Whistleblowing (policy applies to all areas of the school including EYFS)

1 Introduction



“Whistleblowing is the reporting of a concern that something is happening within an organisation which shouldn’t be, or not happening that should be, which may include wrongdoing or relate to the way the organisation is run.” Barnado’s –Speak out if you have a concern (2005)

This policy is the formal statement of intent for whistleblowing and meets the terms of the Public Interest Disclosure Act 1998 and its implementation is the responsibility of all staff. Hatherop Castle School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. A culture of openness and accountability is essential in order to prevent situations such as unethical or inappropriate conduct, or unknowingly harbouring unethical behaviour and a danger to health and safety occurring, but these examples are not exhaustive. This policy is written to ensure that anyone can report a concern without fear of victimisation, subsequent discrimination or disadvantage. You must whistle blow on anyone who puts children at risk or if staff have concerns about poor or unsafe practices and potential failures in the school’s safeguarding systems. It is your duty. Whistleblowing@ofsted.gov.uk Phone this number: On Duty Referrals 03330 139797

The primary area of concern relates to children’s welfare and safeguarding. In such cases, this document should be read in conjunction with the school’s Safeguarding and Child Protection Policy, which also lists further sources of advice and guidance. The key principles of which staff should be aware are laid out in the statutory guidance: Keeping Children Safe in Education (KCSIE) (September 2025).

Aims and Objectives

Each individual within the school has a responsibility for raising concerns about unacceptable practice or behaviour in order to prevent the problem from worsening or widening, to protect or reduce risks to others or to prevent becoming implicated him/herself. This policy is intended to demonstrate that Hatherop Castle will:

- not tolerate malpractice;
- provide a clear mechanism by which concerns can be raised which is accessible to all staff;
- promote a non-hierarchical culture which is approachable, supportive and protective;
- encourage people to feel confident in raising serious concerns and to question and act upon concerns about practices as soon as possible;
- respect the confidentiality of staff raising concerns and will provide procedures for maintain confidentiality so far as is consistent with progressing the issues effectively;
- provide avenues for people to raise concerns and receive feedback on any action taken outside the normal line management;
- ensure everyone receives a response to any concerns raised;
- reassure individuals that they will be protected from possible reprisals or victimisation if they have a reasonable belief and have made the disclosure in good faith.

2 Scope of this policy

- **This procedure is separate from the school’s adopted grievance procedure. Individuals should not use the whistleblowing procedure to raise concerns relating to their own personal circumstances.** There are existing procedures to log a complaint or grievance; this policy is intended to cover major concerns that fall outside the scope of other procedures. **If you are uncertain whether something is within the scope of this procedure seek advice from the School Business Manager, Simon Bristow.**
 - **Malpractice is not easy to define but could include:**
 - possible fraud/corruption
 - failure to comply with codes of practice
 - conduct which is an offence or a breach of statutory law
 - a criminal offence being committed (past, present or likely to be committed)



- unauthorised disclosure of confidential information
- health and safety risks, including risks to the public as well as employees
- damage to the environment
- other unethical conduct.
- sexual or physical abuse or other inappropriate or harmful conduct towards a child (or children), including but not confined to:
 - Bullying, humiliation or any other kind of abuse.
 - Contravening health and safety guidelines in place to protect children.
 - Professional practice that falls short of normally accepted standards.
 - Serious breaches of the school's relevant Staff Code of Conduct.
 - Compromising pupils' welfare, but in a way that does not meet the threshold for child protection intervention.
 - Or that they have concealed or are attempting to conceal any of the above.
- A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the school and should always be reported under this procedure.

3 Assurances to All Employees

The school is committed to good practice and high standards and wants to be supportive of all staff members. It is recognised that the decision to report a concern can be a difficult one to make.

Disclosures made in good faith under this policy will be treated confidentially, seriously and sensitively. Requests for anonymity, where made, will normally be met, but there may be circumstances such as prosecutions or disciplinary investigations where those making disclosures may be asked to come forward as a witness.

The school will not tolerate any harassment or victimisation (including informal pressure) and will take appropriate action to protect employees when they raise a concern in good faith.

Under the Public Interest Disclosure Act 1998, where a staff member has made a 'qualifying disclosure' it is unlawful to dismiss or subject the employee to any detriment as a result of the disclosure. A 'qualifying disclosure' means any disclosure of information which, in the reasonable belief of the employee making the disclosure, tends to show one or more of the following:

- a criminal offence has been committed, is being committed or is likely to be committed
- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject
- a miscarriage of justice has occurred, is occurring or is likely to occur
- the health or safety of any individual has been, is being or is likely to be endangered
- the environment has been damaged, is being damaged or is likely to be damaged
- information tending to show any matter falling within any one of the preceding points has been, is being or is likely to be deliberately concealed.

In addition, a person making a disclosure is protected in law provided they:

- Do so in the public interest
- Do so to an appropriate person e.g. their line manager, Head of Department, The Head, Wishford CEO (Sam Antrobus) or a relevant external person such as the Local Authority Designated Office.
- Reasonably believe that the information disclosed and any allegation contained in it, are substantially true.

4 Untrue Allegations



If an employee makes an allegation in good faith, but it is not substantiated, no action will be taken against the whistleblower. However, where an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

5 How to Raise a Concern

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to their line manager, the Head, or to the Proprietor where the concern relates to the Head. Such concerns will then be treated in accordance with the procedure set out in the Safeguarding Policy.

All other concerns should also be raised with the Head. This can be verbally or in writing. The person who receives the report will decide on the next course of action, which, if the suspicion seems well founded, will involve contacting the Proprietor. However, if the concern involves the Head, or is of a sensitive nature, the concerns may be raised directly with the Proprietor.

If the concerns involve the proprietor they should be raised directly with the Wishford Board at the Head Office address

A meeting will be arranged to discuss your concern as soon as possible. You may bring a colleague or union representative with you to any meetings under this procedure. Anyone attending must respect the confidentiality of your disclosure and any subsequent action. You may be required to attend additional meetings to provide further information as the concerns are investigated.

Any concern will be thoroughly investigated. Where there are allegations of criminal activity, the statutory authorities will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation.

No one who reports a genuine concern in good faith needs to fear retribution. Under the Public Interest Disclosure Act 1998 the member of staff may be entitled to raise a concern directly with an external body :

- where exceptionally serious circumstances justify it;
- that the school would conceal or destroy relevant evidence
- where they believe they would be victimised by the school
- where the Secretary of State has ordered it.

Staff wishing to raise a concern anonymously may also raise issues directly with the Proprietor using the Wishford website: www.wishford.co.uk/whistleblowing

The earlier the concern is raised, the easier it is to take action. Although an employee will not be expected to prove beyond doubt the truth of the allegation, they will need to demonstrate that there are reasonable grounds for their concern.

Staff wishing to discuss their concerns in confidence with an independent third party may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285. Further details may be found here:

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

6 How the School Will Respond

Concerns relating to the behaviour of a member of staff toward a pupil will be treated in accordance with the procedure set out in the Safeguarding Policy.



All other concerns will be investigated and the School will respond to the person raising the concern (unless done so anonymously).

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations, which fall within the scope of specific procedures (e.g. Safeguarding or Grievance issues), will be referred for consideration under those procedures.

Where appropriate, the matter raised may be investigated by the Head, the Deputy Head or the Proprietor, depending on the nature of the issue.

Once an investigation has been conducted and conclusions reached, the Head or Proprietor will implement whatever steps they deem necessary to address the issue. The whistleblower will normally be informed of the outcome of the investigation, subject to the requirement to keep certain information confidential.

7 How the Matter Can be Taken Further

If the whistleblower is not satisfied with any action taken there is a right to take the matter further. The following are possible contact points:

- relevant professional bodies or regulatory organisation
- the Police.

If the matter is taken outside of the School, confidential information or information that is legally protected must not be disclosed. In accordance with the Staff code of conduct, contact with the Press should not be made.

8 Approval & Review

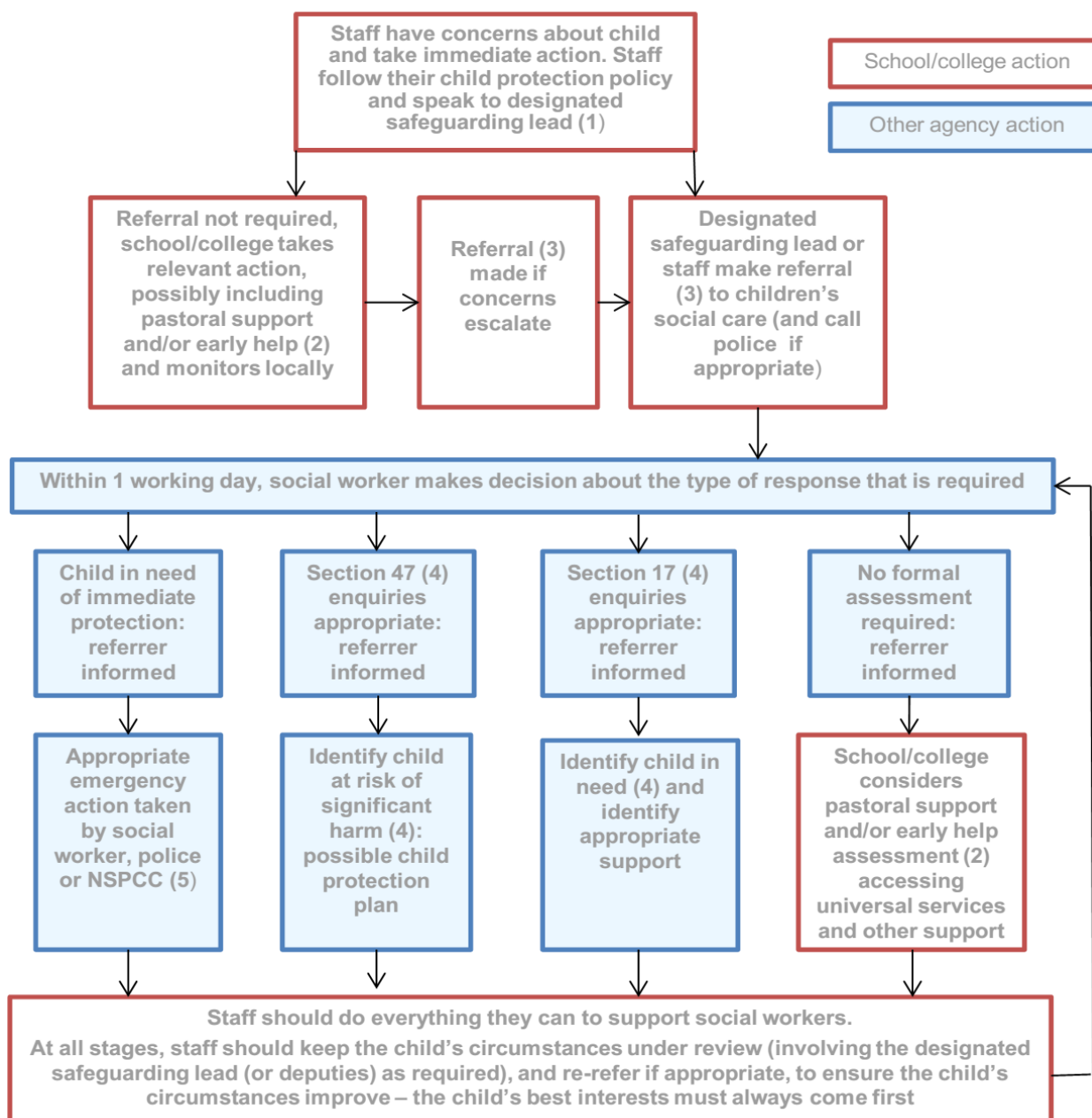
This policy was approved by the Proprietor. It will be reviewed every two years or as necessary following a change in regulation.



Signed: Sam Antrobus Chairman



Annex A – LSCP Information and Flow Chart



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).



[Gloucestershire Safeguarding Children Partnership \(GSCP\)](#) – about us

[GSCP Procedures](#)

[GSCP Resource Library](#) – including protocols and toolkits

[GSCP Working Together](#) - Gloucestershire's multi-agency arrangements to safeguard children

[Gloucestershire's Levels of Intervention Guidance](#) - Working together to provide early help, targeted and specialist support for children (including the unborn) and families in Gloucestershire

[Multi-Agency Safeguarding Hub \(MASH\) & Community Social Work Team](#)

[Early Help Practice Guidance](#)



Annex B - What Is Child Abuse?

Types, Patterns, Recognitions and indicators of abuse and neglect

See the following advice - 'What to do if you're worried a child is being abused' - <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

and 'Practitioners Guide to Threshold Criteria for Children in Need and in Need of Protection' - <http://www.readinglscb.org.uk/information-professionals/threshold-criteria/>

and *Safeguarding Children from Abuse Linked to Belief in Spirit Possession*

<http://webarchive.nationalarchives.gov.uk/20130401151715/http://www.education.gov.uk/publications/eOrderingDownload/DFES-00465-2007.pdf>

Child abuse can fall within the following categories and may take place wholly online or technically may be used to facilitate offline abuse:

- **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 in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional community setting by those known to them or more rarely, by others. Child abuse may take place wholly online, or technology may be used to facilitate offline abuse. Abuse may be by an adult or adults or another child or children.
- **Physical Abuse** – a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
 - **Fabricated or Induced Illness** – Physical harm caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
 - **Harm caused by culture, faith and beliefs** - is defined for the purposes of this policy as the belief that an evil force has entered a child and is controlling him. Sometimes the term 'witch' is used and is defined here as the belief that a child is able to use an evil force to harm others. There is also a range of other language that is connected to such abuse. This includes black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah, demons, and child sorcerers. In all these cases, genuine beliefs can be held by families, carers, religious leaders, congregations, and the children themselves that evil forces are at work. Families and children can be deeply worried by the evil that they believe is threatening them, and abuse often occurs when an attempt is made to 'exorcise', or 'deliver' the child. Exorcism is defined here as attempting to expel evil spirits from a child. The abuse usually occurs in the household where the child lives. It may also occur in a place of worship where alleged 'diagnosis' and 'exorcism' may take place.

Female Genital Mutilation – Staff need to be aware of what this is. (FGM) The partial or total removal of external female genitalia, practice in some cultures. Teachers cannot examine, but only raise concerns with the DSL. Guidance can be found here; <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>. Mandatory Reporting of FGM is in place and procedural information can be found here; <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>. If you become aware of a case, legislation requires you to make a report to the police. It is recommended that you make a report orally **by calling the police using the non-emergency number 101**.



- **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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. Sexual abuse also includes sexual violence and sexual harassment (see below)

Child-on-child sexual violence and/or harassment

- It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and between children of any age or sex and is known as child on child abuse. This can also occur between children from primary through to secondary stage and into colleges. It can occur online 36 and face to face (both physically and verbally) and are never acceptable. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/ breasts/genitalia without consent, can still constitute sexual assault. The sexual abuse of children by other children is a specific safeguarding issue in education. is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the SVSH advice. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

- It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. Sexual violence and sexual harassment may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the SVSH advice. National Crime Agencies (CEOP) safety centre ins to keep children and young people safe from online sexual abuse and advice found and a report can be made on their website.

- **Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be



considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

- Child sexual exploitation (CSE) - involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. A fuller definition is included below.
- 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 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 and the fact that a child is being exploited.
- Emotional Abuse – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Lesbian, gay, bi, trans or queer ("LGBTQ") – The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. When supporting a gender questioning child, the school takes a cautious approach as there might be an impact on social transitioning and the child may have wider vulnerabilities. We endeavour to provide a safe space for LGBTQ children to speak out or share their concerns with trusted members of staff. We consider the range of individual needs, in partnership with parents.
- Homelessness – Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a



property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

- Child abduction and community safety incidents – Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence it is important they are given practical advice on how to keep themselves safe. Further information: www.actionagainstabduction.org and www.clevernevergoes.org
- Children and the court system – Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Further information on preventing radicalisation

Protecting children from the risk of radicalisation should be seen as part of school's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

For advice and support on extremism please view [these documents](#).

Further information on the following specific safeguarding issues can be found on the TES website and the NSPCC website. Broad government guidance is also available via the GOV.UK website.

- Forced Marriage
- Honour-based violence (HBV)
- Domestic Violence (This includes where they see, hear, or experience its effects and this reflects the position under Operation Encompass KCSIE '25)



- Gender based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Sexting
- Teenage relationship abuse
- Trafficking
- Gangs

Signs and symptoms of child abuse

These are some of the signs and symptoms and types of behaviour which may indicate that a child is being abused. In themselves they may not be proof of abuse, but they may suggest abuse if a child exhibits several of them or if a pattern emerges. There is a good deal of overlap between the signs and symptoms of the different categories of abuse.

Possible signs of physical abuse:

- Unexplained injuries or burns, particularly if they are recurrent
- Refusal to discuss injuries
- Improbable explanations for injuries
- Untreated injuries or lingering illness not attended to
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear of returning home or of parents being contacted
- Fear of undressing
- Fear of medical help
- Aggression, bullying
- Over-compliant behaviour
- Running away
- Significant inexplicable changes in behaviour
- Deterioration of work
- Unexplained pattern of absence, which may serve to hide injuries

Possible signs of fabricated illness:

- The only person noticing the symptoms is the parent or carer
- Exaggerating or fabricating symptoms to suggest the presence of an illness
- Repeatedly being absent for apparent medical reasons

Possible signs of harm caused by culture, faith or beliefs:

- Beating, shaking, burning, cutting, stabbing, semi-strangulation, tying up the child, rubbing chilli peppers or other substances on the child's genitals or eyes or placing chilli peppers or other substances in the child's mouth
- Not allowing the child to eat or share a room with family members or threatening to abandon them
- Telling a child that they are possessed
- Failure to ensure appropriate medical care, supervision, regular school attendance, good hygiene, nourishment, clothing

Possible signs of neglect:

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- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at school
- Low self-esteem
- Poor social relationships
- Compulsive stealing or scrounging
- Constant tiredness

Possible signs of sexual abuse:

- Bruises, scratches or bite marks on the body
- Sexual awareness inappropriate to the child's age – shown, for example, in drawings, vocabulary, games etc.
- Attempts to teach other children about sexual activity
- Refusing to stay with certain people or to go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends

Possible signs of emotional abuse:

- Low self-esteem
- Changes in behaviour
- Withdrawal
- Extreme aggression or passivity
- Air of detachment - 'I don't care'
- Mistrust of adults
- Over-compliance
- Social isolation
- Frequent tummy pains and other pains
- Repression
- Depression
- Self-inflicted injuries
- Running away
- Reluctance to go home
- High level of attention-seeking behaviour
- Flinching from contact
- Sudden speech disorders

Possible signs of bullying:

(These signs must be investigated and are deemed unacceptable. Their legal threshold must be understood and the position of vulnerable children, including those with SEN/D, acted upon in accordance with this policy and local authority guidelines.)

- Physical pushing, kicking, hitting and punching
- Verbal name calling, sarcasm, spreading rumours, humiliation and continuous ignoring of individuals
- Racial taunts, taunts to pupils with SEND, graffiti and gestures
- Sexual and abusive comments and unwanted physical contact



- Abusive telephone calls, text messages or e-mails
- Banter which is threatening to another child

Further information can be accessed via the NSPCC's child protection fact sheet "Signs of Abuse" (www.nspcc.org.uk/signsofabuse)

Other Types of Abuse of Current Concern

Child Sexual Exploitation

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.

All children can be at risk from Child Sexual Exploitation. Not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present. The guidance on CSE is non-statutory.

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Practitioners should not rely on 'checklists' alone but should make a holistic assessment of vulnerability, examining risk and protective factors as set out in the statutory guidance Working Together.

Sexual exploitation can have links to other types of crime. These include:

- Child trafficking;
- Domestic abuse;
- Sexual violence in intimate relationships;
- Grooming (including online grooming);
- Abusive images of children and their distribution;



- Drugs-related offences;
- Gang-related activity;
- Immigration-related offences; and
- Domestic servitude.

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence 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); and
- Sexual identity.

Actions:

- Use missing persons approach if appropriate
- Report continuous absence of ten days
- Follow procedures around concerns
- Victims can be of any age, gender, ethnicity or nationality. Look for signs of malnourishment, bruising or lack of required paperwork.

Children with family members in prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information to support staff working with offenders and their children, to help mitigate negative consequences for these children.

Honour Based Abuse (HBA)

So-called “honour-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family or the community, including female genital mutilation (FGM), forced marriage and practises such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse and should be escalated as such. If a member of staff has any concerns they should speak to the DSL (or deputy) who will activate local safeguarding procedures

Female Genital Mutilation (FGM)

This is illegal and a form of child abuse. It involves a procedure to remove all or some of the female genitalia or any other injury to these organs. Staff will be aware of the signs and indicators of this and their legal duty to report **known** cases to the police under section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015).



Multi agency guidelines;

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf

Forced Marriage

Is illegal and a form of child abuse. Since February 2024 it is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday even if violence threats or coercion is not used. This applies to non-binding, unofficial marriages as well as legal marriages.

Multi agency guidelines;

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

Preventing Radicalisation

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. We will intervene where possible to prevent susceptible children being radicalised, which is defined as 'the process of a person legitimising support for, or use of, terrorist violence.

As with all other forms of abuse, staff should be confident in identifying pupils at risk and act proportionately. We will work with other partners including the Channel Panel. The DSL is appropriately trained and be able to offer advice, support and information to other staff.

We will carry out an appropriate risk assessment following consultation with local safeguarding partners of the potential risk in the local area which are discussed with the Heads and Wishford Governance to ensure the school's safeguarding arrangements are robust to help prevent and protect children from being drawn into terrorism.

Further information on Preventing Radicalisation -. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. [Managing risk of radicalisation in your education setting - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/managing-risk-of-radicalisation-in-your-education-setting)

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. (*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.)

The school will follow the legal requirements of reporting as set out by the LSCB

Dealing with issues relating to parental responsibility

<https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility>



Domestic Abuse

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue 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 and/or violence 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. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy

Sexual Violence & Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of 'it could happen here'.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. As set out in Part one of this guidance, schools and colleges should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships

You should read Part five alongside the Departmental advice: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges it contains further detailed information on:

- what sexual violence and sexual harassment constitutes,



- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools and colleges,
- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment, and
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

Children with sexually harmful behaviour

Research suggests that up to 40 per cent of child sexual abuse is committed by someone under the age of 18. If an allegation relates to harmful sexual behaviours, if possible, the disclosure will be managed with two members of staff present, preferably one being the DSL or a DDSL.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour should speak to the DSL as soon as possible.

Online Safety Support

www.thinkuknow.co.uk

[national crime agency education programme -](#)

www.disrespectnobody.co.uk

www.saferinternet.org.uk

www.internetmatters.org

www.pshe-association.org.uk

www.educateagainsthate.com

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation



Annex C - Staff Behaviour and Code of Conduct/Staff Behaviour Policy

In general, pupils should be encouraged to discuss with their parents or guardians issues that are troubling them. It may be appropriate to suggest that a pupil sees their tutor.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Staff should avoid taking one pupil on his/her own in a car. **If this occurs a written record must be kept**

Confidentiality & Information Sharing

The over-riding principal is that the welfare of the child is paramount. Privacy and confidentiality must be respected where possible, provided that doing so does not leave a child at risk of harm.

Staff and other adults who have a concern about a child have a responsibility to share the relevant information with the Designated Safeguarding Lead and/or **Deputy Safeguarding Leads**, who may in turn share that information with other professionals. Sensitive information should be shared with the minimum number of people possible in order to properly investigate and resolve the concern.

Staff should not promise to keep secret information given to them by a child, but should explain that they will pass the information only to those who need to know and can help.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People and Carers supports staff who have to make decisions about sharing information. The proprietor recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the school, local authorities, children's social care, the safeguarding partners and other agencies as required.

The following "golden rules" for information sharing are taken from Government guidance:

- Remember that the Data Protection Act is not a barrier to sharing information. It provides a framework to ensure that personal information about living persons is shared appropriately.
- Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so. If in doubt about what can be shared speak to the DSL.
- Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
- Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
- Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.



- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. If you decide not to share, then record why.

Mobile Phones – Please see Mobile Phone Usage Policy

Our school believes that keeping children safe is of paramount importance. We also seek to ensure that everyone in the school is safeguarded against allegations and works to high standards of professionalism. Practitioners, teachers, volunteers, students and other visitors to the school, who will be in areas where children are present, are asked to switch off their mobile phones and to keep them in their bag or pocket as appropriate. In the EYFS all mobile devices are locked away and not accessed during the school day when children are present

Mobile phones and cameras

The school provides mobile phones for trips and cameras for taking photographs when necessary (staff portfolios whilst training, evidence of pupil progression in EYFS).

Mobile phones should not be used when supervising or teaching children except in cases of emergency. Images of children must not be taken or stored on any personal mobile phone. If a phone/camera is to be used for school blogs or Twitter whilst on educational visits, permission must be obtained from the Head and reference to their use and subsequent safety of data must be referred to on the trip risk assessment. Images must be deleted as soon as they have been used and not stored on the phone or camera.

Photography can be used for recording achievements, for records and for other school use. However, only school cameras can be used to photograph children. Images can only be stored on school, password protected computers and then must be deleted from the camera immediately and especially before the camera leaves the premises on an educational visit. Images can be printed for record and other school purposes.

Consent will be obtained from parents in order for photographs to be taken and used for evidence or recording achievements. Consent will be obtained for use on the school website or in publicity material. Please ensure you are aware of those children for whom permission has not been granted. Any photography or videoing of children will be done by staff/parent/carers and must always take place in full view of others.

Cameras and mobile phones are not permitted in toilet areas or where children are changing.

Communication with Pupils

Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use one of the school's telephones and email using the school system. They should not communicate with pupils using social networking sites, even on educational matters, but should use official email and networking sites sanctioned by the school. Staff should be circumspect in their private use of social networking sites **and – should not have pupils as contacts. Staff should exercise caution in having parents as social media contacts**) and must not discuss school business or school issues on their personal social networking site or risk breaching confidentiality about the pupils. The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The school mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip.



Physical contact with pupils

There is an absolute ban on the use by any member of staff of any form or threat of corporal punishment. This includes any physical contact which is deliberately intended to punish a pupil, or any action which is primarily intended to cause pain, injury or humiliation.

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or of the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSL informed and, if appropriate, a copy placed on the pupil's file.

Physical Restraint (Known as Positive Handling)

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself, another or to property, prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during a teaching session or otherwise or committing an offence and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL who will decide what to do next. Where this relates to the school's nursery/EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.

Transporting pupils

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff. A written record should be kept of any such journeys.

Use of physical interventions:

- There is an absolute ban on the use by any member of staff of any form of corporal punishment. This includes any physical contact which is deliberately intended to punish a pupil, or any action which is primarily intended to cause pain, injury or humiliation.
- It is important to allow children to do what they can for themselves, but depending on age and circumstances it may be necessary for some physical contact to take place; (e.g. a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves, running into the road etc.),
- Section 93 of the Education and Inspections Act 2006 enables school staff to use 'reasonable force' to prevent a pupil from :
 - a) committing any offence (or, for a pupil under the age of criminal responsibility, what would be an offence for an older pupil);



- b) causing personal injury to, or damage to the property of, any person (including the pupil himself);
or
- c) prejudicing the maintenance of good order and discipline at the school or among any pupils receiving education at the school, whether during the teaching session or otherwise.
- School staff may also be empowered to carry out physical searches for weapons, illegal drugs, pornography etc. Actions by school staff must at all times be in accordance with guidance and procedures. In the event of searches or physical restraint being needed, parents will be informed the same day.



Annex D - Chronological record of conversations, observations and phone calls relating to the safety and protection of children

Recording Form for Safeguarding Concerns when not using email or CPOMS.

Name of Child		
Gender	Age	Date of birth

Your name	Position	Date and time of incident

Name and details of person raising concern (if applicable)
Description of incident or circumstances concern including (i) child's perspective (verbatim where possible); (ii) details of anyone alleged to have caused the incident or concerns; and (iii) details of any witnesses or others who share the concerns

Date and time brought to attention of DSL/Head/Proprietor	Brought to whose attention
Signed	Date and time

This form should immediately be passed to the Designated Safeguarding Lead ("DSL"), or the Head/Proprietor as appropriate



Form B - DSL follow up form

Time form received by DSL:

Action taken by DSL:

Referred to...?

Attendance Lead	Police	CADS	PSA	Community	Other Partnerships
☐	☐	☐	☐	☐	☐

Date:

Time:

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

☐	☐	☐	☐
Pastoral team	Teacher	Child	Person who recorded disclosure

Further Action Agreed:

e.g. School to instigate a Family Support Process, assessment by Children's Services

Full name:

DSL Signature:

Date:



Annex E - The Language of Safeguarding and Child Protection

Child/Children - Everyone under the age of 18.

Safeguarding – Safeguarding and promoting the welfare of children is defined as

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

Child Protection - Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Safeguarding, in addition to child protection, encompasses issues such as pupil health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse. These areas have specific policies and guidance which should be read in conjunction with this document.

Significant harm - The Children's Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

Early Help – 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. It is about providing support quickly whenever difficulties emerge to reduce the impact of problems.

Responsibilities - The responsibility for child safeguarding falls on everybody who is employed at the school. All adults who work at this school are expected to support the school's Child Protection Policy, with overall responsibility falling upon the

CAF – Common Assessment Framework an early help inter-agency assessment. It offers a basis for early identification of children's additional needs, the sharing of this information between organisations and the coordination of service provision. Early help assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The findings from the Common Assessment may give rise to concerns about the child's safety and welfare. In these circumstances, it should be used to support a Referral to Children's Social Care: however, undertaking a CAF is not a pre-requisite for making a referral.

CADS – Children's Advice and Duty Service

Staff - Refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Parent - Refers to birth parents and other adults who are in a parenting/carer role, for example step-parents, foster carers and adoptive parents.

LADO – a post in the local authority, to coordinate and manage allegations against staff.



Social Care Direct – Local Authority children social care/Family services.

LSCP - Local Safeguarding Children's Partnership

DSL - Designated Safeguarding Lead.

Proprietor – The person with overall responsibility for the governance of the school, Sam Antrobus.



Annex F – DSL Job Description

Manage referrals

- Refer cases of suspected abuse to the local authority children's social care as required;
- 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;
- 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
- Refer cases where a crime may have been committed to the Police as required and within one working day
- Be aware that parent consent is not required for referrals to statutory agencies

Work with others

Act as a point of reference with the three safeguarding partners

- Liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four KCSIE) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- Liaise with staff (especially pastoral support staff, school medical teams, IT technicians and SENDCos) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice and expertise for staff.

Undertake training

- The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role, including inter-agency training. This training should be updated at least every two years. The designated safeguarding lead and any Deputies should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action, local authority children's social care referral arrangements.
- Have a working knowledge of how their local authority conducts 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;
- On induction and at regular periods, ensure each member of staff has access to and understands the school's child protection policy and procedures, the staff behaviour policy, the Behaviour Policy, the safeguarding response to children who are absent from education, the role of the designated safeguarding lead, the work of the three safeguarding partners, GSCB advice including Prevent and online safety, especially new and part time staff; Prevent training extends to all members of staff. All staff will be trained in managing a report of sexual violence and harassment in line with KCSIE 2025.



- Build a culture of 'it could happen here' and are alert to the specific needs of children in need, those with special educational needs and young carers;
- Understand the importance of information sharing, both 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 (Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.)
- 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. Abuse can be wholly online and can facilitate offline abuse.
- The DSL is responsible for the Online Safety of the children and the understanding of the filtering and monitoring systems and processes the school has in place.
- Can recognise the additional risks that children with SEN and disabilities SEND face online, eg from online bullying, grooming and radicalisation and are confident they can support SEND children to stay safe online.
- 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;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- Ensure the school child protection policies are known, understood and used appropriately, including awareness of the DSL's role, the whistleblowing policy, the early help process and the staff's role in it, their capacity to make referrals to children's social care and why, and what to do if a child tells them they are being abused or neglected;
- Ensure the school child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the local LSCB and the three safeguarding partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding. The DSL should give regular updates to staff as required.
- Child protection file - part of next section
- Where children leave the school ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as the DSL and the SENDCo are aware of the content of these files.

Consider if it is appropriate to share any information with the new school in advance of a child leaving; e.g. if it would allow the new school to continue supporting victim/alleged perpetrators of abuse.

