



A collaboration of schools which enhances the educational experiences and outcomes for children, maximising the benefits of working together, whilst maintaining the individual culture and ethos of each individual school

Child protection and safeguarding policy including allegations against staff and low level concerns

Author:	DSL of Altwood School and Lead Governance Professional
Approver:	Curriculum Committee and Local Governing Committee of Altwood School
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Changes history

Version:	Date:	Amended by:	Substantive changes:	Purpose:
1			New trust policy	
2		DSL of Altwood School and Lead Governance Professional	New sections on operation encompass and alternative provision	To reflect KCSIE 2025 and our practice

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Mr Gary Goodman (Assistant Headteacher)	01628 622236 Altwood@altwoodschoo.co.uk
Designated safeguarding lead (DSL) (FAB Football Academy)	Mr Lee Togwell	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Ms Bekki Lamb (Head of Faith House)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Ms Lourdes Gomez (Head of Hope House)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Mr Andrew Smith (Head of Joy House)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Miss Lianne Horwood (Student Engagement Co-ordinator)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Ms Rachael Rietdyk (Student Support Mentor)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Ms Hayley Moran (Student Support Mentor)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Ms Emma Whelan-(Lead Student Support Mentor)	01628 622236 Altwood@altwoodschoo.co.uk
Deputy DSL	Ms Carolyn Williams (6 th Form Progress Champion)	01628 622236 Altwood@altwoodschoo.co.uk
Local authority designated officer (LADO)		01628 683202 LADO@achievingforchildren.org.uk
Royal Borough of Windsor & Maidenhead safeguarding queries	Clive Haines	clive.haines@achievingforchildren.org.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Multi Agency Services Hub (MASH) and Early Help Hub (EHH)		01628 683150 MASH@achievingforchildren.org.uk
Royal Borough of Windsor & Maidenhead Multi Agency Safeguarding Board (LSCB)		01628 683234 https://rbwmsafeguardingpartnership.org.uk website: (rbwmsafeguardingpartnership.org.uk)
Safeguarding Governor	Mrs Jan McLucas	01628 622236 Altwood@altwoodschool.co.uk
Safeguarding Trustee	Dr. Alison Silby	C/O Rebecca Marr – Lead Governance Professional Marr@agapetrust.co.uk 01189 402357
Channel helpline		020 7340 7264
Thames Valley Police		101 (or 999 if there is an immediate risk of harm)
NSPCC (Dedicated support helpline)		0800 0280285 help@nspcc.org.uk

1. Aims

The trust and schools within the trust aim to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education’s (DfE’s) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- › Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

This policy also complies with our funding agreement and articles of association.

The procedures are consistent with those of the Royal Borough of Windsor and Maidenhead’s Local Safeguarding Children Board (LSCB).

3. Definitions

Safeguarding and promoting the welfare of children means:

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

- › Safeguarding is preventative and proactive

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. Child Protection is intervention and reactive.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

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 role, for example stepparents, foster carers and adoptive parents.

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

- › The local authority (LA)
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

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

We give special consideration to children who:

- › Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- › Are young carers

- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language (EAL)
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member’s mental health needs
- › Are looked after or previously looked after (see section 12)
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

We have carefully considered the impact of this policy and the possible implications for members of our school community with protected characteristics as part of our commitment to meet the public sector equality duty requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. If you feel you or another member of our school community has or may be negatively impacted by this policy, please contact us.

5. Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers, trustees and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. We embrace the John 10:10 principle of “I have come that they may have life, and live it to the full.”

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour policy
- › Pastoral support system
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they’re always unacceptable

5.1 All staff

All staff will:

- › Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- › Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance, have attended annual safeguarding training and will abide by the staff code of conduct.
- › Read and understand our safeguarding and child protection policy, our whistleblowing policy, our Prevent policy, and our school's behaviour policy
- › Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- › Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- › use the photographic consent information to guide whether to take photographs of students
- › only use the photographs of students whose parents have declined photographic consent for internal use purposes with regard to student identification
- › Only use one's school email account to communicate with students past and present

All staff will be aware of:

- › Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, the IT acceptable usage policies and the safeguarding response to children who go missing from education.
- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- › The fact that children can be at risk of harm inside and outside of their home, at school and online

- › The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- › That a child and their family may be experiencing multiple needs at the same time
- › What to look for to identify children who need help or protection

Section 21 and appendix 2 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Gary Goodman – Assistant Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL or Deputy DSL's can be contacted via email outside of school hours, however a response may not be given until the next school working day.

When the DSL is absent, the deputies will act as cover in conjunction with the Headteacher: **Bekki Lamb**, Head of Faith House; **Lourdes Gomez**, Head of Hope House; **Andrew Smith**, Head of Joy House; **Lianne Horwood**, Student Engagement Co-ordinator; **Rachael Rietdyk**, **Hayley Moran** and **Emma Whelan**, Student Support Mentors; **Carolyn Williams**, Sixth Form Progress Champion).

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

- › Ensure robust safeguarding arrangements are in place and embedded in the daily life and practice of the school
- › Ensure a structured procedure within the school, which will be followed in cases of suspected abuse
- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- › Contribute to the assessment of children
- › Have a working knowledge of RBWM Multi Agency Safeguarding Board (<https://rbwmsafeguardingpartnership.org.uk/>) and AfC procedures.
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Notify Children's Social Care if a child subject to a child protection plan is absent from school without explanation
- › Organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, and liaise with Finance Office to keep a record of attendance and address any absences
- › Carry out, with the Headteacher and the Agape Trust, an annual audit of the Safeguarding Policy, procedures and practices
- › Have an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate
- › Have a good understanding of harmful sexual behaviour

- › Have a good understanding of the filtering and monitoring systems and processes in place at our school
- › Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- › Keep the Headteacher informed of any issues
- › Act as a source of support, advice and expertise within the school when deciding whether to make a referral by liaising with relevant agencies
- › Ensure that a systematic means of monitoring children known or thought to be at risk of harm, is in place and that the school contributes to assessments of need and supports multi agency plans for those children
- › Ensure that, in order to avoid conflict later, parents are aware that referrals may be made and of the role of the School
- › Share information effectively regarding welfare, safeguarding and child protection issues that may affect attendance, engagement or achievement within school
- › Ensure that when children leave the school, their Child Protection File is discussed as soon as possible with the DSL at the new school
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- › With the Headteacher, provide an annual report to the Local Governing Committee detailing safeguarding training undertaken by all staff and maintain up to date registers of who has been trained.

The DSL is not responsible for dealing with allegations made against members of staff. This is the responsibility of the Headteacher who will inform the Local Authority Designated Officer (LADO).

5.3 The Trust Board/Local Governing Committee

The respective role and responsibilities of the Trust Board and The Local Governing Committee in relation to safeguarding are set out in the scheme of delegation.

The Trust Board/Local Governing Committee will:

- › Ensure that all members of the school community including the Designated Safeguarding Governor, Designated Safeguarding Trustee, Designated Safeguarding Lead and all members of the school community have appropriate safeguarding procedures in place should they choose to raise safeguarding issues or concerns on any level
- › Secure an ethos within the school community where all adults feel confident, competent, comfortable and supported to draw safeguarding issues to the attention of the Headteacher, DSL, Designated Safeguarding Governor or Designated Safeguarding Trustee and are able to pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children

- › Ensure robust safeguarding arrangements are in place and embedded in the daily life and practice of the school
- › Ensure that procedures are in place to deal with allegations of abuse against staff and volunteers
- › Put in place and promote robust anti-bullying, including cyber bullying, strategies
- › Ensure sufficient trustees and governors are trained in safer recruitment practices so that appointments to the senior leadership team can be adequately supported and training is repeated every 5 years
- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a link governor and link trustee to monitor the effectiveness of this policy in conjunction with the Local Governing Committee and Trust Board. This is always a different person from the DSL
- › Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- › Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
 - Reviewing the Generative AI: product safety expectations <https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations> and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- › Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- › Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
 - An annual audit of Altwood School's safeguarding policies, procedures and practices is undertaken with the Headteacher and designated safeguarding lead (DSL) and that this is reported to the Board and submitted to RBWM Multi Agency Safeguarding Board (<https://rbwmsafeguardingpartnership.org.uk/>)

The Chair of the Local Governing Committee will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate). The Chair of Trustees will act as the 'case manager' in the event an allegation of abuse is made against the CEO, where appropriate. See appendix 3 for allegations against staff and low-level concerns.

All trustees and governors will read Keeping Children Safe in Education in its entirety.

5.4 The Headteacher

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

- › Ensuring that staff (including temporary staff) and volunteers (excluding Members of the Central Trust Team):
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- › Communicating this policy to parents/carers when their child joins the school and via the school website
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › In case of absence of the DSL, assume the lead on safeguarding matters, working with Deputy DSLs
- › In case of longer-term absence of the DSL, undertake either temporary or more long term restructuring of the Safeguarding Team to ensure the full role of the DSL is carried out by a suitably trained member of staff i.e. Headteacher or a Deputy DSL
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- › Ensure that all members of the school community including the Designated Safeguarding Governor, Designated Safeguarding Lead and all members of the school community have appropriate safeguarding procedures in place should they choose to raise safeguarding issues or concerns on any level
- › Secure an ethos within the school community where all adults feel confident, competent, comfortable and supported to draw safeguarding issues to the attention of the Headteacher, DSL or the Designated

Safeguarding Governor and are able to pose safeguarding questions with “respectful uncertainty” as part of their shared responsibility to safeguard children

- › Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- › Ensure children know that there are adults in the school whom they can approach if they are worried
- › Include opportunities in the Personal, Social and Health Education (PSHE) and RSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse
- › Take all reasonable measures to ensure risks of harm to children’s welfare are minimised
- › Promote pupil health and safety
- › Promote safe practice and challenge unsafe practice
- › Put in place and promote robust anti-bullying, including cyber bullying, strategies
- › Meet the health needs of children with medical conditions
- › Provide first aid
- › Maximise school security
- › Tackle drugs and substance misuse
- › Work with all agencies with regard to missing children, anti social behaviour/gang activity and violence/knife crime in the community
- › Ensure staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies
- › Undertake safer recruitment training in order to comply with the statutory requirement to have a trained person on every recruitment panel
- › With the DSL provide an annual report to the Local Governing Committee detailing safeguarding training undertaken by all staff and maintain up to date registers of who has been trained.

5.5 CEO

The CEO is responsible for the implementation of this policy for members of the Central Trust Team, including:

- Ensuring that staff including temporary staff and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer of the Central Trust Team, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the Trust DSL’s on this.

5.6 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

While it is recognised that all matters relating to safeguarding individual children are confidential, a member of staff, trustee, governor or volunteer, if confided in by a pupil, must never guarantee confidentiality to a pupil.

Where there is a child protection concern it will be passed immediately to the DSL who will contact the Local Authority Designated Officer (LADO) if appropriate – see pages 3 and 4 for contact details.

The parents/carers of the child should be informed immediately unless it is felt that this would not be in the best interests of the child, would place them at further risk or where it is believed a crime may have been committed. Advice will first be sought from the SPA (Single Point of Access). Where there are concerns about forced marriage, honour-based abuse or any harmful practice, parents should not be informed a referral is being made, as to do so may place the child at a significantly increased risk.

The Headteacher, DSL or Deputy DSL's will disclose personal information about a pupil, including the level of involvement of other agencies, to other members of staff only on a 'need-to-know' basis.

All staff must be aware that they have a professional responsibility to share information, both within school and with other external agencies, in order to safeguard children.

It should be noted that:

- › Timely information sharing is essential to effective safeguarding
- › Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- › The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- › If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- › Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- › If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: 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

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

› Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

› The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

› If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 21, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care

- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

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

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

Make a referral to SPA (Single Point of access) and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

SPA: 01628 683150

OUT OF HOURS: 01344 786543

[SPA referral form](#)

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

You may wish to refer to the GOV.UK webpage for reporting child abuse to your local council:

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

7.2 If a child makes a disclosure to you

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

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

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

Staff will exercise professional curiosity and will try to give the child the opportunity to talk, or to inform one of the pastoral or safeguarding teams to make further enquiries. It is fine for staff to ask the student if they are okay, or if they can help in any way.

Staff should record the concern on CPOMS and make a member of the safeguarding team aware verbally.

Making a referral to the Single Point of Access (SPA)

Concerns about a student or a disclosure should be discussed with the DSL and Safeguarding Team, who will help decide whether a referral to the SPA is appropriate. If a referral is needed, the DSL or a Deputy should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one has not been made, they can and should consider making a referral themselves.

The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the student.

If you have not had any feedback from SPA within 72 hours of making the referral, it will be followed up by the school.

If, after a referral, the student's situation does not appear to be improving, the DSL and Safeguarding Team (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the student's situation improves.

SPA: 01628 683150

OUT OF HOURS: 01344 786543

[SPA referral form](#)

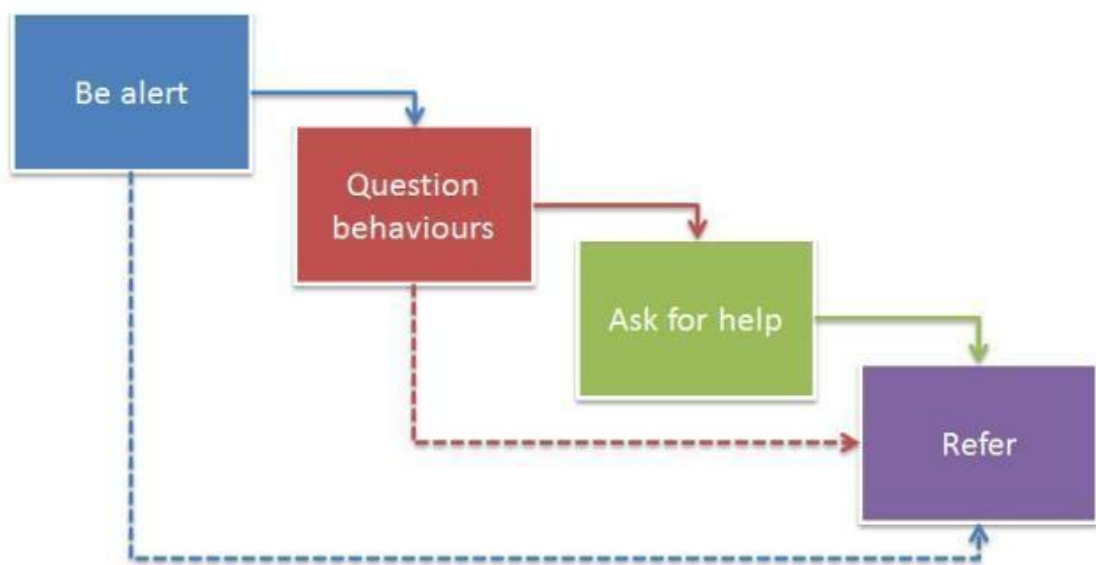
Additional guidance for staff includes:-

- **'What to do if you are Worried About a Child Being Abused' (DfE 2024)**
- **Information Sharing advice for safeguarding practitioners (2024)**

These documents can be found in the [S:\Safeguarding\Key documents](#)

'What to do if you are worried about a child being abused' (DfE 2024) p.12 identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and / or neglect.

All members of staff are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children’s social care and / or the police.

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.

- To help with this decision the DSL may choose to consult with the MASH team.
- Advice may also be sought from the Early Help Hub.
- Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents / carers are made aware of these.

All members of staff are made aware of the Early Help process, and understand their role within it. This includes identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

If Early Help is assessed to be appropriate, the DSL will support staff members involved with the family in liaising with other agencies and submitting an Early Help Hub / MASH referral form. The DSL will keep all early help cases under review and will give consideration to making a referral to MASH if the situation does not appear to be improving for the child.

New referrals to services will be made using the agreed RBWM process i.e. Early Help Hub / MASH referral form. These will be made with reference to the RBWM Multi Agency Threshold for Safeguarding the Child’s Journey. In situations where there are felt to be urgent or grave concerns, a telephone referral will be made to the MASH team prior to the form being completed. Concerns for children who are already known to services will be passed to the allocated worker / team.

All members of staff are aware of the process for making referrals to MASH for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

In all but the most exceptional circumstances, parents / carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to MASH being necessary, parents /carers will be informed and consent to this will be sought unless there is a valid reason not to do so. If the DSL is unsure as to whether parents should be informed they will request advice from the MASH team and / or social worker.

In the absence of the availability or appropriateness of the DSL and Deputy DSLs to discuss an immediate and urgent concern, staff can seek advice from the MASH team. If anyone other than the DSL were to make a referral to external services, then they would inform the DSL as soon as would be possible and practicable.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2 of this policy.

Any teacher who either:

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

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

The duty applies to all persons employed or engaged to carry out ‘teaching work’ in the school, whether or not they have qualified teacher status. Please refer to the Home Office and Department for Education’s procedural information for full details: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead.

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

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

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

Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures (Verbally advise a member of the safeguarding team and record on CPOMS)

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help

At Altwood School we are prepared to identify children who may benefit from "early help", which means providing support as soon as possible once a problem emerges in a child's life. In the first instance staff should discuss early help requirements with the DSL.

Any child may benefit from early help, but at Altwood School we are particularly aware of the potential need for early help for a child who:-

- is disabled and has specific additional needs
- has special educational needs (whether or not they have an EHCP)
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- is CME or missing from home
- is misusing drugs or alcohol
- 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 a privately fostered child
- has emerging challenging behaviours.

The safeguarding team can take a case to the [Early Help](#) to seek multi-agency support.

If Early Help and / or other support is appropriate, the case will be kept under review and consideration given to a referral to children's social care if the child's situation does not appear to be improving. The DSL is aware of the local escalation policy and procedures. We work closely with local professional agencies

including social care, the police, health services and other services including voluntary organisations to promote the welfare of children and protect them from harm. This includes providing a co-ordinated 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.

As part of meeting a child's needs, our Governing-Board Trustees and Governors recognise the importance of sharing information between professionals and local agencies. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

[Early Help Strategy](#)

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

On occasion, staff may pass information about a child to the DSL, but remain anxious about action subsequently taken. Staff should feel able to clarify with the DSL further progress, so that they can reassure themselves the child is safe and their welfare is being considered.

If following this process, the staff member remains concerned that appropriate action is not being taken then the member of staff should seek further direct consultation from a member of the MASH team who will be able to discuss the concern and provide further advice on appropriate action to be taken.

If after a referral a child's situation does not appear to be improving then the DSL (or the person that made the referral) will press for reconsideration to ensure that the school's concerns have been addressed and, most importantly, that the child's situation improves. Professional disagreements (escalation) will be responded to in line with the RBWM's LSCB procedures and DSLs may request support via Children's Services.

7.5 If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

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

7.6 If you have a concern about mental health

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Possible warning signs include:-

- Persistent sadness — two or more weeks
- Withdrawing from or avoiding social interactions
- Hurting oneself or talking about hurting oneself
- Talking about death or suicide
- Outbursts, or extreme irritability
- Out-of-control behaviour that could be harmful
- Drastic changes in mood, behaviour or personality
- Changes in eating habits
- Loss of weight, or gaining of weight
- Difficulty sleeping
- Frequent headaches or stomach aches
- Difficulty concentrating
- Changes in academic performance
- Avoiding or missing school

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Altwood School aims to promote positive mental health for all staff and students.

Our mental health lead is: our Headteacher, working closely with Emma Whelan. Once aware of a mental health difficulty experienced by one of the students, there is support available in school via tutor, Head of House, Safeguarding team, or any trusted member of staff. The school also has access to on-site counselling from Number 22, and NHS Mental Health Support nurses from the NHS, which will be utilised following referral from Emma Whelan. Furthermore, coaching and mentoring are available from older students, especially facilitated by the vertical tutoring system. If a referral is to be made to the Early Help Hub, this will be completed in a timely fashion, with parental consent wherever feasible. In all cases where possible,

families will be informed. Staff are also able to benefit from support if they are having concerns about their own well-being, and can raise such concerns to the Safeguarding Team, or the Headteacher.

Altwood School will ensure that staff, students and parents are made aware of the support available in school and in the local community.

Useful links:-

Mental health and behaviour in schools guidance - <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

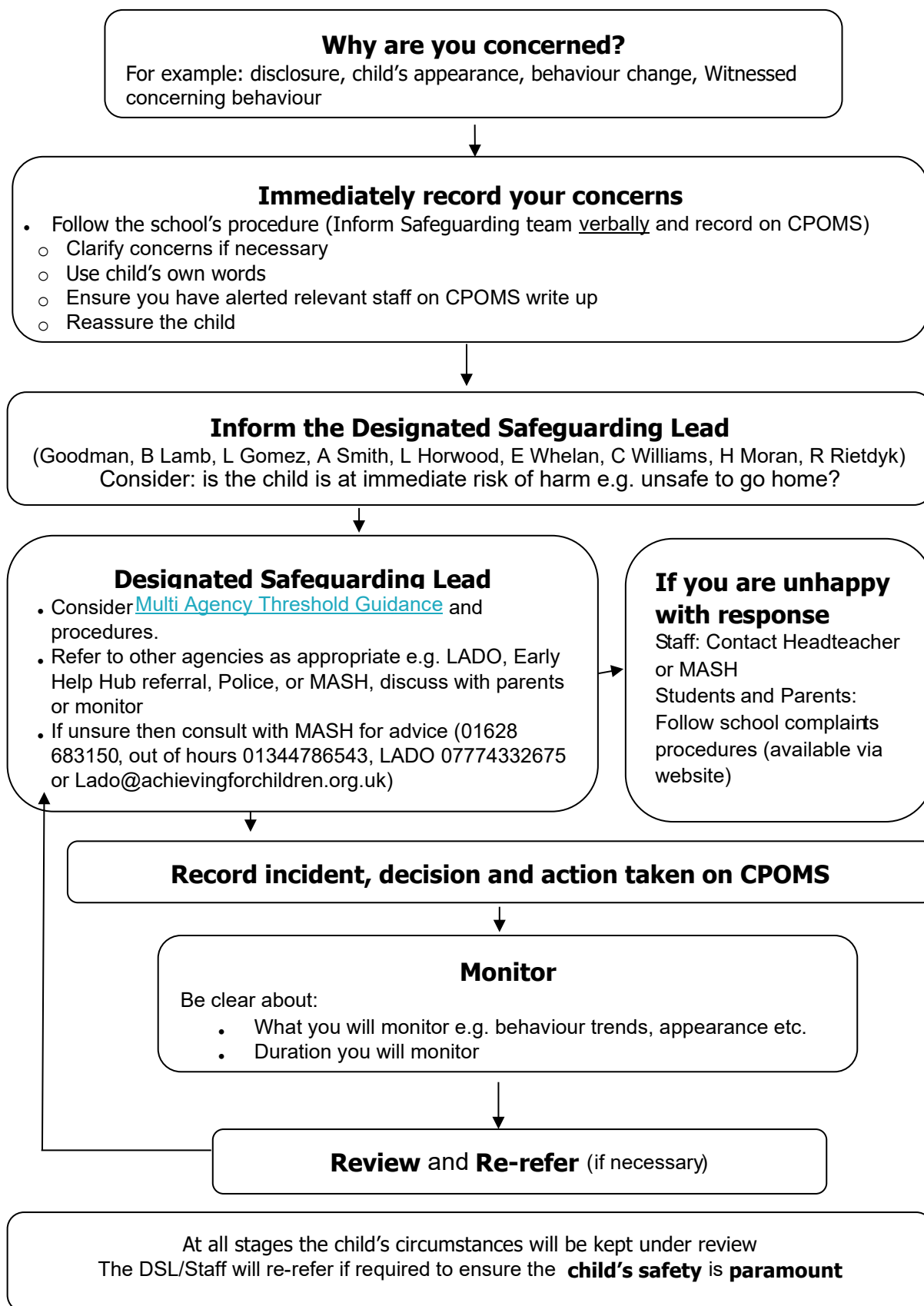
NSPCC - <https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/>

Mind - <https://www.mind.org.uk/>

Kooth - <https://www.kooth.com/>

RBWM Mental health Toolkit - <https://primarysite-prod-sorted.s3.amazonaws.com/rbwm-leadershiphttps://primarysite-prod-sorted.s3.amazonaws.com/rbwm-leadership-update-and-schools-bulletin/UploadedDocument/a0faa1c295e64200981f0e4e5b1820be/wellbeing-toolkit-dec-2020.pdfupdate-and-schools-bulletin/UploadedDocument/a0faa1c295e64200981f0e4e5b1820be/wellbeinghttps://primarysite-prod-sorted.s3.amazonaws.com/rbwm-leadership-update-and-schools-bulletin/UploadedDocument/a0faa1c295e64200981f0e4e5b1820be/wellbeing-toolkit-dec-2020.pdftoolkit-dec-2020.pdf>

Figure 1: What to do if you have a welfare concern in Altwood School



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of the Local Governing Committee. If the concerns/allegations relate to a member of the Central Trust Team speak to the CEO. If the concerns/allegations relate to the CEO speak to the Chair of Trustees.

The Headteacher/Chair of the Local Governing Committee/CEO/Chair of Trustees will then follow the procedures set out in the allegations of abuse against staff procedures, if appropriate (appendix 4).

If you have concerns about the Chair of the Local Governing Committee or the Chair of the Trust Board or an allegation is made about the Chair of the Local Governing Committee or the Chair of the Trust Board posing a risk of harm to children, speak to the CEO as soon as possible. The CEO will then follow the procedures set out in the allegations of abuse against staff procedures, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim. Behaviour may be intimate or non-intimate.

Children should feel encouraged and empowered to report all behaviour that may be perceived to be child-on-child abuse. It is important that children understand that the law is there to protect them rather than criminalise them. Schools must understand intra familial harms and respond with any necessary support for siblings following incidents.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- › Is serious, and potentially a criminal offence
- › Could put pupils in the school at risk
- › Involves pupils being forced to use drugs or alcohol

- › Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

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

- › You must record the allegation via CPOMS and tell the DSL or a member of the Safeguarding Team but do not investigate it
- › The DSL or Safeguarding Team will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL or Safeguarding Team will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- › The DSL or Safeguarding Team will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- › Take all allegations of child-on-child abuse seriously and respond in accordance to the safeguarding and behaviour policies
- › Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- › Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- › Ensure staff reassure victims that they are being taken seriously and they will be supported following the disclosure
- › Advise pupils to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate
- › Work with the wider community and local and / or national organisations to provide further or specialist advice and guidance
- ›

- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- › Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

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

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- › If it is necessary to view the imagery then the DSL will:
 - never copy, print or share the imagery; this is illegal
 - discuss the decision with the Headteacher
 - ensure viewing is undertaken by the DSL or deputy DSL with delegated authority from the Headteacher
 - ensure viewing takes place with another member of staff present in the room, ideally the Headteacher, another DSL or a member of the Senior Leadership Team. The other staff member does not need to view the images
 - wherever possible ensure viewing takes place on school premises, ideally in the Headteacher's or DSL's office
 - ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
 - record the viewing of the imagery in the student's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

›

- › What further information is required to decide on the best response
- › Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to delete or remove images or videos from devices or online services
- › Any relevant facts about the pupils involved which would influence risk assessment
- › If there is a need to contact another school, college, setting or individual
- › Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

Advice will be sought from the MASH teams will regard to further action in terms of informing the family(ies) and carers and the local police.

Where the actions have taken place outside of school, the impact in school will be considered in terms of considering what additional interventions and sanctions will take place via the school. Where the actions have involved school premises, property or services, additional interventions and / or sanctions will be utilised by the school in line with the Behaviour for Learning policy.

The DSL will make an immediate referral to police and/or children's social care if:

- › The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 2 for more information on assessing adult-involved incidents
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEND)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- › Pressure has been applied to a number of pupils (e.g. all female pupils in a class or year group) to create and share indecent images of themselves
- › There has been dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 21 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education, PSICHE programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- › What it is
- › How it is most likely to be encountered
- › The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- › Issues of legality
- › The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- › Specific requests or pressure to provide (or forward) such images
- › The receipt of such images

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

Teaching follows best practice in delivering safe and effective education, including:

- › Putting safeguarding first
- › Approaching from the perspective of the child
- › Promoting dialogue and understanding
- › Empowering and enabling children and young people
- › Never frightening or scare-mongering
- › Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

We recognise that the school plays a significant part in the prevention of harm to our children by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. We recognise that children who are abused or witness violence may feel helplessness, humiliation and some sense of blame and that their behaviour may be challenging or defiant, or they may be withdrawn. We appreciate that school may be the only stable, secure and predictable element in the lives of children at risk.

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

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

To achieve this, we will:

- › Put systems in place for pupils to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- › Ensure that all pupils know there is an adult in the school whom they can approach if they are worried or in difficulty
- › Provide the opportunity to talk to an adult of their choice at any time
- › Ensure that children who may be LGBTQIA+ have a trusted adult who they can open with
- › Make it clear pupils will be supported following disclosure
- › Regular consult with our young people. For example this may be through questionnaires, participation in anti-bullying assemblies and presentations, monitoring playground incidents etc.
- › Implement the behaviour policy which is aimed at supporting vulnerable pupils, ensure pupils know what behaviour is acceptable and that they understand that sanctions will apply along with restorative justice and forgiveness as appropriate
- › Ensure that, where a pupil subject to a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed
- › Students will be educated at a level appropriate to their age and ability about a range of safeguarding concerns through personal, social, health, citizenship and economic education (PSHCE), and through relationships education, sex and relationship education (SRE) and Health education. This will be specifically via the Personal Development (PD) provision for Key Stage 4, covering 5 periods per term on calendared days and periods, PSHCE lessons for Key Stage 3, but also through assemblies, tutor times and in lessons. This will include, but is not limited, to:- bullying (including cyber bullying), radicalisation and extremism, personal safety, child sexual exploitation (CSE), child criminal exploitation (CCE), "honour based violence", female genital mutilation, self-esteem, knife crime, stranger danger, road and rail safety, fire safety, drugs and alcohol abuse, sexual abuse, consent, neglect, gender based violence, positive relationships, sexual assaults and sexual violence and sharing of nude or semi-nude images or videos, mental health, consumer safety, and whom to talk to.
- › Specific systems outside of expected day to day classroom interaction and support will include:-
 - School and House Council (Altwood Parliament)
 - Peer-mentoring systems
 - PSHE events
 - Feedback questionnaires with groups of children
 - Anti-bullying activities
 - Achievement Centre, including Behaviour Mentors, counsellors from Number 22, Attendance Officer and NHS Mental Health Support Team colleagues
 - Posters in each classroom detailing key purpose of the Safeguarding Team, its members and their locations

Pupils should report concerns to any member of staff.

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers, trustees and governors including robust tracking systems of activity and transparency of practice
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate. Our curriculum and pastoral care structure has mechanisms to identify, intervene in and escalate any concerns regarding the online activity of our young people.

The 4 key categories of risk

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

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

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

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

- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras unless there are exceptional circumstances. For example, an exceptional circumstance may arise when pictures/videos are taken to showcase a pupil's performance and a school device is unavailable. In these exceptional circumstances the pictures/videos should be uploaded to the school's network at the very earliest opportunity and then deleted from the personal device, ensuring that it has also been deleted from any cloud system on the personal device. Staff will also ensure that the relevant parental/student consents are in place for the taking of photos/recordings.

- › Make all pupils, parents/carers, staff, volunteers, trustees and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Have a clear and sufficiently detailed policy which covers the taking and use of digital images and video of pupils and takes steps to ensure that it is understood and enforced. Particular care will be taken when images of pupils may pass beyond the direct control of the school and into the public domain, e.g. on the school website, social networking. Guidance will include reference to the storage and deletion of images of pupils, including the policy on the use of devices with a facility to store or transfer data to other locations (e.g. 'cloud' storage) to ensure the school is in line with ICO (Information Commission's Office) guidance
- › Ensure that appropriate written permissions are obtained before any photographs or videos are used.
- › Where parental permission has not been obtained, or it is known that a pupil should not be photographed or filmed, every reasonable effort should be made to ensure that a pupil's image is not recorded.
- › Use only the pupil's first name with an image
- › Ensure that pupils are appropriately dressed
- › Encourage pupils to tell us if they are worried about any photographs that are taken of them
- › Ensure that pupils do not take photographs or video images of other pupils without their express permission and the permission of a member of staff
- › The school will attempt to keep an eye on social media, apps and webpages to ensure the school is not brought in to disrepute and posts and images or videos do not portray pupils without their consent
- › Make clear where the school chooses to allow the recording of images at events that images may only be recorded for personal use, can only be shared with immediate family and friends and not shared on social networking sites.
- › Consider when taking part in events organised by other schools or organisations, what image guidelines should apply. For larger events it is reasonable to expect that specific image guidelines should be in place. Consideration should be given as to how those attending the event will be informed of the image guidelines that apply. Although the school will make reasonable efforts to safeguard the digital images of pupils, parents should be made aware that at some types of event it is not always realistic to strictly

enforce image guidelines. The school cannot therefore be held accountable for the use of images taken by parents or members of the public at events.

- › Explain the sanctions we will use if a pupil is in breach of our policies on online safety and mobile phones
- › Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- › Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- › Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policy in this area please refer to our E-safety policy on our school website.

Altwood School's online safety policy, as part of the Behaviour for Learning Policy explains how we try to keep students safe in school and protect and educate students in the safe use of technology. Altwood School follows the DfE guidance regarding teaching online safety in schools (2023 [Teaching online safety in schools](#))

Online bullying and sharing nudes and semi-nudes by students will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sharing nudes and semi-nudes' below).

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard/ Gemini.

Altwood School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Altwood School will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Staff should be familiar with and adhere to the DfE guidance: Generative AI: product safety expectations and the Trust's AI policy. <https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>

9. Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- › Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- › Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges
- › Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- › Working with our SEND department and SENDCo
- › Individual support plans
- › Soft landings and regular interactions with key members of staff
- › Opportunities to have a 'go to' member of staff to discuss any concerns or worries they may have

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

12. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, Ms Gail Prince, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

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

[Role and responsibilities of the designated teacher](#)

Details of the AfC Virtual School can be found at: [AfC Virtual School](#)

13. Pupils who are lesbian, gay, bisexual or gender questioning

We understand that revised guidance on gender questioning pupils is expected shortly. We will review this policy in light of any future guidance.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Our Behaviour Support Team, Pastoral Team and Inclusion Officers all offer help and support.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (autism) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm

to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Volunteers

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, are expected to follow the policies and procedures in the same way as paid staff.

Where a parent or other volunteer helps on a one-off basis, he/she will only work under the direct supervision of a member of staff, and at no time have one to one contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period then they will be checked to ensure their suitability to work with children.

15. Before and After School Activities and Contracted Services

Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply

When our students attend off-site activities, we will ensure that effective child protection arrangements are in place

Where a parent has expressed their intention to remove a child from our school with a view to educating at home, we will work together with the parent, EHE co-ordinator and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant where a child has SEND, is vulnerable, or has a social worker.

Where our students stay with host families abroad (for example, as part of a language exchange) the school will ensure that all available local safeguarding checks are carried out, compliant with the laws and regulations in force in the host jurisdiction. Parents will be informed of the extent of these checks to enable them to make a decision about whether their child should participate.

Where the Trust Board/Local Governing Committee transfers control or otherwise allows the use of school premises to external bodies (such as sports clubs) or service providers during or out of school hours, we ensure that these bodies or providers have appropriate safeguarding policies and procedures, suggest that there are arrangements in place to co-ordinate with the school on such matters and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved then an application to use premises will be refused.

The school accepts its responsibilities with regard to employing its safeguarding practices if it were to receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children. As with any safeguarding allegation, we will follow this policy and related procedures, including informing the LADO

16. Alternative provision

We will seek written confirmation from our alternative provision providers that

- appropriate safeguarding checks have been carried out of their staff
- they will notify us of any changes that might put children at risk, such as staff changes, so we can ensure that appropriate safeguarding checks have been carried out

We will:

- maintain records of the address of the alternative provider and any subcontracted provision
- review alternative provision placements at least half termly to ensure the child is regularly attending, the placement continues to be safe and it meets the child's needs

Where safeguarding concerns arise, the placement will be immediately revised and/or terminated unless the concerns have been satisfactorily addressed.

17. Identified areas of particular risk for our school:

17.1 St Edmund Campion site

On an adjacent plot at the same site is St Edmund Campion Catholic primary school. This creates extra potential risk particularly around the traffic at the beginning and the end of the day. During the morning, parents drop children off on the private road between the two schools, with a member of St Edmund Campion welcoming them as they open car doors. Part of the travel plan includes the car park at the western end of Altwood School having its gates open up to 8.45am each morning, as it acts as a turning circle for St Edmund Campion car traffic. Students are aware this is not a permitted entry or exit point of the school. Following consultation with the Headteacher of St Edmund Campion, the end time for the "Kiss and go" to drop students off in the morning was brought forward to 8.45am to synchronise with the start of the school day at Altwood, and reduce risk of a student leaving site after registering. Furthermore, there is a high volume of traffic both before and after the school day. Altwood School finishes ten minutes earlier to mitigate the risk at the end of the day, with senior staff at the only open student gate in the morning, and in the bus bay in the afternoon to assist in managing risk.

17.2 Busy road (A4) to the north of the site

The northerly exit from the site is to the pavement of the A4, a busy main artery through Maidenhead. There is a pelican crossing in the immediate proximity to assist students with road crossings.

17.3 Sharing site with NHS

Part of the site is occupied by an NHS administration team. The team has valid DBS certificates, and we have a copy of their safeguarding policy. Their used rooms are separate from student and staff traffic on site. They partake fully in evacuation and lockdown drills.

17.4 FAB

FAB Football Academy students are Altwood students. They are of KS5 age, and take a vocational Sports qualification alongside English GCSE and Maths retakes if needed to achieve Grade 4. Most of the coaching and BTEC work takes place at Bisham Abbey National Sports Centre. FAB students attend some of their lessons on the Altwood site.

Bisham Abbey NSC is a public site. Registers are taken using SIMS remote desktop so that attendance can be determined. When a student leaves the direction and supervision of FAB staff, they sign out, stating

what they intend to do and where, including skills practice on the NSC site, using the gym as private members, or private study for example. FAB has produced a risk assessment for maintaining safety at the site. Lee Togwell is one of the Deputy DSLs for Altwood School so that he can lead on Safeguarding matters with regard to FAB students, in liaison with the Altwood School DSL.

17.5 High SEND ratio

Altwood School has a proportionately high number of students with SEND, and therefore extra vigilance is needed by all staff to ensure that all elements of the Safeguarding Policy are implemented effectively. Staff are made acutely aware of this during at least annual safeguarding training.

18. Complaints and concerns about school safeguarding policies

18.1 Complaints against staff

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

18.2 Other complaints

For other safeguarding complaints for example, those related to pupils or premises, please refer to our complaints policy on our website <https://www.altwoodschool.co.uk/>

18.3 Whistleblowing

We have a separate whistleblowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures. This is published on our school website <https://www.altwoodschool.co.uk/>

19. Conduct of Staff

The school has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. All staff in the school will read and sign the Staff Code of Conduct annually.

At all times, members of staff are required to work in a professional way with children. All staff should be aware of the expectations, inherent risks and possible consequences in:

- Working alone with a child
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to, and receiving gifts from, children and parents
- Contacting children through private telephones (including texting), e-mail, MSN, or social networking websites
- Disclosing personal details inappropriately
- Meeting pupils outside school hours or school duties
- Making inappropriate sexual comments; excessive one to one attention beyond the normal requirements of the role; or inappropriate sharing of images

If any member of staff has reasonable suspicion that a child is suffering harm or at risk, and fails to act in accordance with this policy, this will be viewed as misconduct or gross misconduct, and appropriate action will be taken.

20. Physical Intervention

Altwood School promotes a positive environment for all staff, students, volunteers and visitors. Staff should always employ de-escalation techniques to stop situations escalating and we acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others. At all times, minimal force is used to prevent injury to another person.

All incidents involving physical intervention will be recorded and signed by a witness.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'safe practice' guidance to ensure they are clear about their professional boundaries.

[Positive environments where children can flourish](#)

[Use of reasonable force in schools](#)

21. Supporting staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or who appears likely to suffer harm, may find this situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through anxieties with the Senior Designated Person or Headteacher and to seek further support with external agencies, if necessary. Counselling is available from school and details can be found in the Staff Wellbeing Policy. The School has arrangements in place with Number 22 Counselling service so that all staff, with particular reference to the DSL, can gain access to counselling, including supervision.

All new staff including newly qualified teachers and support staff will receive induction training and have a mentor or co-ordinator with whom they can discuss concerns including safeguarding concerns.

The school will provide appropriate supervision and support for all members of staff to ensure that:-

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- Staff are able to create an environment where members of staff feel able to raise concerns and feel supported in their safeguarding role
- All staff have regular reviews of their own practice to ensure they improve over time as part of the line management, performance review and appraisal process.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly. Further information about a range of supporting organisations can be found in Appendix 4.

Staff will have access to The Guidance for Safer Working Practices for Adults who work with Children and Young People. This provides advice on the boundaries of appropriate behaviour and the circumstances that should be avoided in order to limit complaints against staff of the abuse of trust and/or allegations of abuse.

22. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing on CPOMS (with a body map where injuries have been observed) within 24 hours of disclosure. All records must provide a factual, evidence-based account. Accurate recording of actions must be made. Records will be signed, dated and where appropriate witnessed. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- › A clear and comprehensive summary of the concern
- › Details of how the concern was followed up and resolved
- › A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

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

The school is transitioning to all records being entered and maintained on CPOMS as digital copies. Students with previously held paper based records are having their records scanned and uploaded to CPOMS, in order of level of need in the following order or priority:-

1. Those on an active Child Protection Plan
2. Those on an active Child In Need Plan
3. Those who are an active and current concern
4. Those formerly on a CP Plan
5. Those formerly on a CIN Plan
6. Those formerly of concern

It may be that some of the files remain as paper-based copies, especially for older students, and are dealt with in accordance with secure practices and timescales.

The Headteacher will be kept informed of any significant issues by the DSL.

All safeguarding records will be forwarded in accordance with data protection legislation to a child's subsequent school or setting, under confidential and separate cover to the new DSL or Headteacher and a receipt of delivery will be obtained. Where possible, this will take place digitally to schools who also use the CPOMS, or compatible, technology.

To allow the new school/college to have support in place when the child arrives, this should be within:

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

If Altwood is the last school that the student attends, their child protection file will be securely stored by the school until seven years after they left the school, when it will be securely destroyed.

Detailed guidance on Record Keeping is found in a separate document "Guidance for Safeguarding Record Keeping in Schools". All Staff will familiarise themselves with the responsibilities as outlined in this document.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Where the new school is not known the Educational Welfare Officer at the Local Authority should be informed so that the child can be included on the data base for Children Missing Education.

Please refer to our safer recruitment procedures and allegations of abuse against staff-procedures for further details as to how we keep information safe.

23. Training

23.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, equalities, and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. All members of staff are made aware of the Altwood Church of England School's expectations regarding safe and professional practice via the Staff Expectations and Acceptable Use Policy (AUP) which is provided and discussed as part of the induction process.

This training will be regularly updated and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through staff training sessions, staff briefing, dissemination of key documents, bespoke training or email as required).

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

Volunteers will receive appropriate training, if applicable.

23.2 The DSL and Deputies

The DSL and Deputies will undertake child protection and safeguarding training at least every 2 years. The training will be approved by and meet the standards as required by the Royal Borough of Windsor & Maidenhead (RBWM) Local safeguarding Board.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through CPD training, local Inclusion Managers' network meetings, specific RBWM training events, e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

23.3 Trustees/Governors

The Designated Safeguarding Governor, Mrs Jan McLucas will undertake initial Safeguarding training and refresher training every year. All trustees and governors will have an enhanced DBS check and undertake Prevent training. All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated at least annually. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the Chair of the Trust Board and Chair of the Local Governing Committee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher or CEO, they receive training in managing allegations for this purpose.

32.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. For more information please refer to our safer recruitment procedures.

24. Monitoring arrangements

This policy will be reviewed **annually** by the DSL and the Lead Governance Professional. At every review, it will be approved by the Curriculum Committee of the Trust Board.

25. Links with other policies

This policy links to the following policies and procedures:

- Behaviour for learning including dealing with bullying
- Staff code of conduct including acceptable use policy of technology and ICT
- Complaints
- Prevent
- Allegations of abuse against staff
- DfE guidance on use of Physical Intervention / Restraint - Our policy regarding the use of reasonable force and physical restraint is that all staff should follow the guidelines found in the DfE document "Use of

Reasonable Force” published in July 2013. Both reasonable force and physical restraint should only be used when essential for safeguarding children, and physical contact between staff and students is generally discouraged.

- DfE guidance on Searching, screening and confiscation
- Health and safety
- Attendance and admissions
- Equality
- Risk assessments (e.g. school trips, use of technology)
- Relationships and sex education and PSHE
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistleblowing
- E- safety
- Safer recruitment procedures
- Data protection
- SEND
- Retention of records schedule
- Medical needs
- First Aid
- AI
- Modern slavery

Supporting Guidance (to be read and followed alongside this document)

- “Teachers Standards” updated 2013
- “Safeguarding Disabled Children – Practice Guidance” - DSCF, 2009
- “Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - Safer Recruitment Consortium, October 2015 • “What to do if you are worried a child is being abused” – DfE, March 2015
- “Disqualification Under the Childcare Act 2006” Updated 2016.
- “Keeping Children Safe In Education” 2024
- “Education Inspection Framework” Ofsted, 2019.
- “Working Together to Safeguard Children” December 2023.

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

RBWM's Threshold Document is taken in to consideration when deciding upon whether a specific concerns meets the definition of a form of abuse.

https://rbwmsafeguardingpartnership.org.uk/assets/1/multi_agency_threshold_guidance_february_2016.pdf

Appendix 2: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- › Contacted by an online account that they do not know but appears to be another child or young person
- › Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- › Moved from a public to a private/E2EE platform
- › Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- › Offered something of value such as money or gaming credits
- › Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- › Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- › Use images that have been stolen from the child or young person taken through hacking their account
- › Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- › Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- › Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- › Moved from a public to a private/E2EE platform
- › Pressured into taking nudes or semi-nudes
- › Told they have been hacked and they have access to their images, personal information and contacts
- › Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

Altwood Church of England School monitors attendance closely and works with our partner local authorities and to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education from our roll. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

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

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a school
- › Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

This includes informing the local authority if a child leaves the school without a new school being named, adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

The Attendance Officer follows up with parents / carers with regard to unauthorised attendances and raises concerns to the Education Welfare Service via the relevant Education Welfare Officer. Students who are "persistently absent" from school i.e. with an attendance of under 90% are also discussed with the Education Welfare Officer to ensure that they are not at risk of missing education. Colleagues who become concerned over a student missing education for any reason will raise their concerns to the DSL and / or the Attendance Officer. These processes will help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Any student deemed at risk of being a CME will be placed on to the school's priority contact list for first day of absence so that the risk can be mitigated, wherever possible, or swift action can be taken to safeguard the child(ren).

The DSL is also the lead for Attendance, and oversight of those children absent or missing from school, including those absent on repeat occasions and / or for prolonged periods. Concerns should be raised with the DSL as a matter of urgency, and updates discussed in the regular line management meetings between the DSL (Assistant Headteacher) and the Attendance Officer, as well as at weekly SLT meetings as appropriate. A robust response will be employed with children who are persistently absent to avoid them becoming CME. This is even more important for those children known to social care. Further support and guidance are available at [Working together to improve school attendance](#)

We will ensure, where possible, that we have more than one emergency contact number for each student. This will give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and / or safeguarding concern.

If we were to discover a child's contact details reaped no reply despite repeated attempts, then we would employ a written letter posted to the home and a home visit to try and make contact and gain more potential methods of contact.

The school operates in accordance with statutory guidance [Children missing education: statutory guidance for local authorities](#)

RBWM CME policy & referral: [Local Guidance](#)

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

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

We will work with the Local Authority's Childrens Services where a child's absence indicates a safeguarding concern.

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation
- › Suffering from changes in emotional wellbeing
- › Misusing drugs and alcohol
- › Going missing for periods of time or regularly coming home late
- › Regularly missing school or education
- › Not taking part in education

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

The school and Trust remains committed to working alongside the Police and other agencies in order to support early recognition and intervention for young people who are at risk of this type of exploitation.

Further information and support can be found by using the 'County Lines Toolkit for professionals' [County Lines Toolkit For Professionals | The Children's Society \(childrenssociety.org.uk\)](https://www.childrenssociety.org.uk/county-lines-toolkit-for-professionals)

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes.

Like other forms of abuse and exploitation, county lines exploitation:-

- can affect any child or young person (male or female) under the age of 18 years

- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

For more information see: [Criminal exploitation of children and vulnerable adults: county lines Preventing youth violence and gang involvement](#)

School-related weapons incidents

Altwood School has a duty and a responsibility to protect and safeguard our students and staff. Altwood School will inform SPA and the police of any incident involving a weapon or potential weapon.

Teachers have a number of legal powers, which include the power to search students without consent for a number of 'prohibited items'. These include knives and weapons; alcohol; illegal drugs and stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, cause personal injury or damage to property; and any item banned by the school rules that has been identified in these rules as an item that may be searched for [searching, screening and confiscation](#)

Altwood School recognises that children and young people involved in school-related weapons incidents, including the alleged perpetrators, are vulnerable. Altwood School will provide support, protection and education to develop an understanding of the implications of carrying, and / or using, weapons.

Child sexual exploitation

Altwood School follows the London Child Protection Procedures for safeguarding children from sexual exploitation. [Safeguarding Children from Sexual Exploitation](#)

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can affect any child or young person (male or female) under the age of 18, including 16 and 17 year olds who can legally consent to have sex.

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to SPA and the police, if appropriate. A multi-agency approach is adopted to ensure holistic support is available – potentially involving partner agencies such as the Police, Early Help Hub, Social Services, School Nurse, the Missing Persons / Child Sexual Exploitation Co-ordinator and the Youth and Family Support Service.

Altwood Church of England School strives to support and teach students about how to make positive choices and informed decisions in their relationships so that they develop awareness and can protect themselves from all potential forms of sexual exploitation and abuse. As a school we promote healthy friendships and relationships through the school ethos, school policies, student-staff relationships and the PSHE and Citizenship curriculum. An awareness of the risk factors and signs and indicators of CSE is key for all staff as is how to access support and guidance.

Prevention

Staff are made aware of this policy and the importance of on-going vigilance and early intervention to prevent the likelihood for sexual exploitation and abuse occurring.

The issue of CSE is also raised on different levels within the school and will be informed by support and guidance from the Local Authority and partner agencies as appropriate:-

At a whole school level:

Achieved through staff briefings and student assemblies which provide information and guidance relating to CSE as well as the support available in school and through external agencies.

Information and guidance:

Provided and reinforced through tutor time and the PSHCE curriculum via personal Development Days. This provides positive guidance and advice to facilitate and support healthy personal and social development, along with E-Safety issues.

At an individual level:

Where concerns are identified or suspected (through information received or disclosed) a response will be fashioned in line with this policy. All expressions of concern will be taken seriously and investigated.

It is accepted that all children and young people may potentially be at risk of online CSE.

Altwood Church of England School commits to having appropriate staff complete CEOP training and attend Borough training on CSE to ensure that appropriate knowledge and skills are available to support the school community.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- › Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- › Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- › Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- › 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
- › Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- › Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- › Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

What to do:-

- When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the designated safeguarding lead should be informed.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact children's services to discuss the case. It is possible that children's services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a children's services referral where appropriate.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both students' files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

Bullying

Altwood School has an anti-bullying policy which is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms, e.g. online, racist, homophobic, gender, SEND-related bullying. We keep a record of known bullying incidents. All staff are aware that children with differences or perceived differences are more susceptible to being bullied or being victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the headteacher and DSL will consider implementing child protection procedures.

The subject of bullying, the forms it takes and sub-categories including racism, are addressed at regular intervals in PHSE education.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment

that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

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

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

If a member of staff is concerned that a pupil is subject of or witness to domestic abuse then this should be reported to the DSL.

Altwood School has signed up to the police initiative Operation Encompass that helps the school to provide silent support to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child's circumstances and can enable silent support to be given to the child according to their needs.

<https://www.operationencompass.org/> Please also refer to appendix 5 for more information on operation encompass.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and Deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

Children with family members in prison

Altwood School recognises that children who have a family member in prison are at increased risk of poor outcomes including poverty, stigma, isolation, poor mental health, CCE and future offending. The school will work with agencies and resources such as the National Information Centre on Children of Offenders, NICCO, to help mitigate negative consequences for those children <https://www.nicco.org.uk/>

Contextual safeguarding and exploitation

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extrafamilial abuse can undermine parent-child relationships.

The focus of contextual safeguarding and exploitation (CS&E) is implementing child safeguarding practices into community spaces to ensure that children are protected from the harm they experience outside of the family home. This focus moves beyond just assessing parenting capacity to safeguard a child at home, to assessing the impact of peer groups and community spaces (schools and neighbourhoods) on a child's safety and wellbeing outside the home.

It looks to identify the influences outside the family that can impact the parent-child relationship and the safety of a child in the community. It then adapts the child protection systems, safeguarding partnerships, and creates new professional networks with those who have an influence in the location so that the identified child, their family and the community are safe.

Altwood School will maintain records of concerns about extrafamilial harm in the same way as other concerns are recorded and in accordance with our safeguarding procedures.

Concerns relating to significant harm and extrafamilial harm will be referred by the DSL to the Single Point of Access Team; if considered appropriate, a multi-agency strategy meeting will be held to determine threshold for significant harm.

[contextual safeguarding the Assessment Triangle \(PDF\)](#)
[RBWM threshold](#)

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- › A pupil confiding in a professional that FGM has taken place
- › A mother/family member disclosing that FGM has been carried out
- › A family/pupil already being known to social services in relation to other safeguarding issues
- › A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE

- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- › The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- › FGM being known to be practised in the girl's community or country of origin
- › A parent or family member expressing concern that FGM may be carried out
- › A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- › A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- › Speak to the pupil about the concerns in a secure and private place
- › Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- › Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- › Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

For further information see: [Guidance forced marriage](#)

School staff will never attempt to intervene directly as a school or through a third party. Contact will be made with the Single Point of Access.

[Asian Women's Resource Centre](#)

Child trafficking and modern slavery

Human trafficking, is defined in the UN Protocol on trafficking, adopted in 2000, as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern slavery as it is often referred to, is a crime and a safeguarding issue affecting millions across the world and in the United Kingdom.

Staff at Altwood School are alert to the existence of modern slavery and child trafficking and concerns will be recorded and reported to SPA as appropriate.

Types of Modern Slavery

Examples of industries and services where slavery exist in the UK today, the victims of which include children and young people are (with examples):- ● the sex industry, including brothels

- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding
- In addition, victims can be forced into criminal activities such as cannabis production, theft, or begging.

Modern slavery is an issue that transcends age, gender and ethnicities. It can include victims that have been brought to the UK from overseas or vulnerable people in the UK being forced illegally to work against their will. Children and young people have an increased vulnerability to slavery. Poverty, limited opportunities at home, lack of education, unstable social and political conditions and war are some of the situations that contribute to trafficking of victims and slavery.

Slavery can be linked to a number of safeguarding issues, including CSE and CCE, but normally includes at least one of the following specific situations:-

- Child trafficking: young people being moved internationally or domestically so that they can be exploited.
- Forced labour: victims are forced to work through physical or mental threat, against their will, often for very long hours for little or no pay, in conditions that can affect their physical and mental health. They are often subjected to verbal or physical threats of violence against them as individuals or their families.

- **Debt bondage:** victims forced to work to pay off debts that they will never achieve. Debts can be passed down to children. Extreme examples include where a victim may be owned or controlled by an 'employer' or sold as a commodity.

Possible signs and indicators that someone is a victim of modern slavery that anyone working with children and young people should be aware of include:-

- **physical appearance:** poor physical condition, malnourishment, untreated injuries and looking neglected
- **isolation:** victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. They may not interact and be unfamiliar in their local community
- **poor living conditions:** victims may be living in dirty, cramped or overcrowded accommodation, with multiple children living and working at the same address or premises
- **personal belongings:** few possessions, wearing the same clothes each day and no identification documents
- **restricted freedom:** victims have little opportunity to move freely and may be kept from having access to their passport
- **unusual travel times:** victims may be dropped off or collected from work on a regular basis either very early or late at night
- **reluctance to seek help:** victims may avoid eye contact, appear frightened or hesitant to approach people and have lack of trust or concern about making a report should they be deportation or fear of violence on their family

If a member of Altwood School staff suspects that a student may be a victim they will, in the first instance, report their concerns to the DSL.

The DSL will seek advice and support from SPA who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM).

Further advice can be provided directly by the modern slavery helpline on 0800 012 1700. [Modern slavery: how to identify and support victims](#)

Please refer to the Agape Trust's modern slavery policy.

Private fostering

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Altwood School recognises that most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When Altwood School becomes aware of a private fostering arrangement for a student that has not been notified to Children's Social Care, we will encourage parents and private foster carers to notify Children's Social Care themselves in the first instance, but also alert them to our mandatory duty as a school to inform the local authority of children in such arrangements.

[Looking after someone else's child](#)

Preventing radicalisation

- › **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- › **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- › **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

Our School values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, with freedom of speech comes responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will challenge the expression and / or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home. We provide opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all students are valued and listened to within school.

Altwood School recognises the importance of providing a safe space for children to discuss controversial issues and build the resilience and critical thinking skills needed to challenge extremist perspectives. When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism,

they will speak with the DSL. Altwood School will discuss any concerns about possible radicalisation identified in school with a student's parents and carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk. They will also support parents and carers who raise concerns about their children being vulnerable to radicalisation.

We will then follow normal safeguarding procedures, which may involve contacting the SPA for consultation and further advice and / or making appropriate referrals to the police PREVENT team and Channel programme for any student whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure children receive appropriate support. Referrals to Channel are for those who are susceptible to radicalisation, but do require the individual's consent.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

Staff should **always** take action if they are worried.

If the matter is urgent then Thames Valley Police must be contacted by dialling 999 or the confidential anti-terrorist hotline on 0800 789 321.

In non-urgent cases where police advice is sought then contact should be via 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264). You can also email counter.extremism@education.gov.uk.

Further information on the school's measures to prevent radicalisation are set out in our prevent policy.

Parents and staff may find the following websites informative and useful:

[Protecting children from radicalisation: the prevent duty](#)

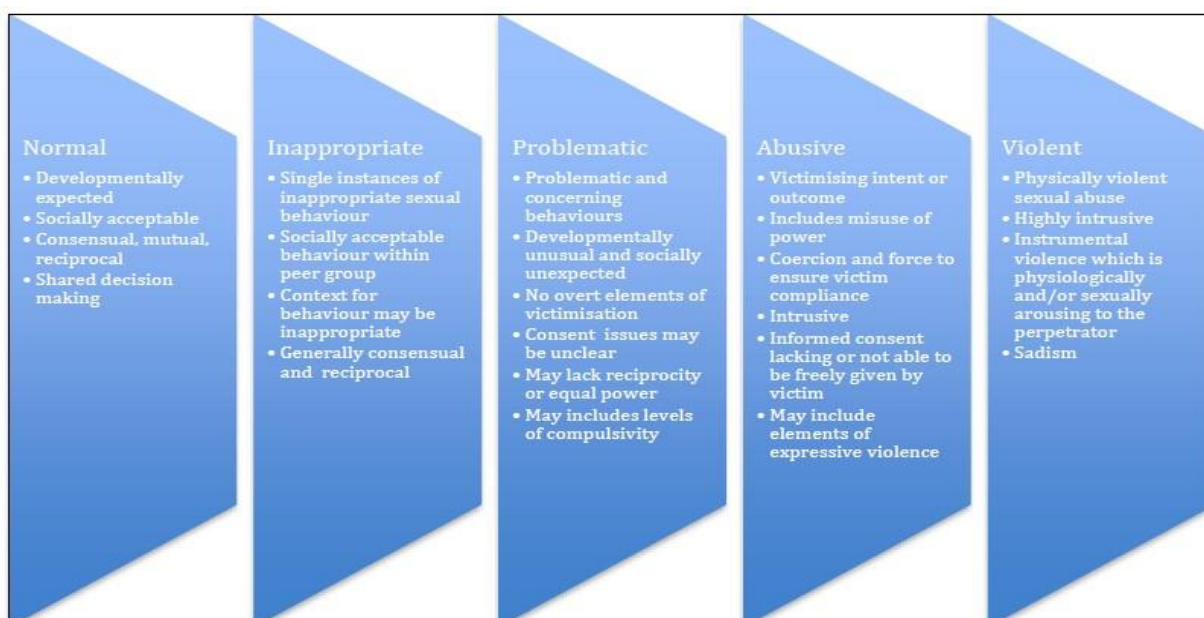
[Educate against hate](#)

Sexual violence and sexual harassment between children in schools

Altwood School follows the DfE's advice about sexual violence and sexual harassment between children in schools and colleges. [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(DfE September 2021\)](#)

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)
- › Harmful sexual behaviours:



Harmful sexual behaviours refers to problematic, abusive and violent sexual behaviours which are developmentally inappropriate and may cause developmental damage. For more information see [NSPCC Harmful Sexual Behaviours](#)

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour would be considered particularly harmful if one of the partners is much older, particularly if there is more than two years' difference in age, 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. A useful tool is: [Beyond Referrals Toolkit](#)

Harmful sexual behaviours will be considered in a child protection context.

Altwood School recognises that students displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support. It must also be taken in to account that no child under the age of 16 is capable of giving consent to having sex and therefore is unlawful. Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

The PSHCE and RSE curriculum covers the following issues according to the age and stage of development of the students:-

- healthy and respectful relationships

- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment is always wrong
- addressing cultures of sexual harassment
- consent

Responding to allegations of sexual harassment and sexual violence

Students in our school know how to report concerns. All reports are treated seriously, including those that occur online or out of school.

Altwood School will make decisions on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

The management of children and young people with sexually harmful behaviour is complex and Altwood School will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect both the victim and the alleged perpetrator. A written record will be made and next steps discussed, taking into account the views of the victim.

The need for a risk and needs assessment for reports of sexual harassment will be considered on a case-by-case basis. The assessment, which will be reviewed at regular intervals, will consider:-

- whether there may have been other victims

- the victim, especially their protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at Altwood School, especially any actions that are appropriate to protect them from the alleged perpetrator or from future harm.

Altwood School will ensure that appropriate measures are put in place to safeguard and support the alleged or proven victim, the alleged perpetrator and the school community. Useful links: [Stop it Now](#) [Beyond Referrals](#)

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the student and / or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, disciplinary action will be taken in accordance with our Behaviour for Learning Policy.

Upskirting

Altwood School will ensure that all staff and students are aware of the changes to the [Voyeurism \(Offences\) Act 2019](#) which criminalise the act of 'upskirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to

victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.”

Incidents of upskirting in the school will not be tolerated. Altwood School will make decisions on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school’s approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- › Being male
- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

[Preventing youth violence and gang involvement](#)

Cybercrime

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).

Cyber-dependent crimes include

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- denial of service (DoS or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a student in this area, the DSL (or a deputy) will consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It 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.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety. Additional advice can be found at: [National Cyber Security Centre](#) [When to call the police](#)

Suicide and self-harm

Suicide: an act of deliberate self-harm which results in death.

Self-harm: self-poisoning or self-injury, irrespective of the apparent purpose of the act.

Suicide and self-harm links: self-harm is generally a way of coping with overwhelming emotional distress. Many young people self-harm where there is no suicidal intent. However, research shows that young people who self-harm can be at a higher risk of suicide.

Self-harm is seen by the victim as a coping mechanism, and is a symptom of experiencing challenging emotions. Young people who hurt themselves often feel that physical pain is easier to deal with than the emotional pain they are experiencing, because it is tangible. The behaviour only provides temporary relief and fails to attempt to resolve any underlying issues. For some people, self-harm may last for a short time. For others, it can become a long-term problem. Some people self-harm, stop for a while, and return to it months, even years, later, in times of distress.

Risk factors that indicate a child or young person may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as bereavement; bullying; online bullying; mental health problems including eating disorders; family problems such as domestic violence; or any form of abuse or conflict between the child and parents.

The most common forms of self-harm are:-

- cutting
- biting
- burning, scalding, branding
- picking at skin, reopening old wounds
- breaking bones, punching
- hair pulling
- head banging
- ingesting objects or toxic substances
- overdosing with a medicine

Self-harm is usually a secretive behaviour but signs may include:- ●

wearing long sleeves at inappropriate times

- spending more time in the bathroom

- unexplained cuts or bruises, burns or other injuries ● unexplained smell of Dettol, TCP, etc.
- low mood - seems to be depressed or unhappy, low self-esteem, feelings of worthlessness
- mood changes e.g. anger, sadness
- changes in eating or sleeping patterns
- losing friendships, spending more time by themselves and becoming more private or defensive
- withdrawal from activities that used to be enjoyed
- abuse of alcohol or drugs

Altwood School recognises that any student who self-harms or expresses thoughts about self-harm and / or suicide must be taken seriously and appropriate help and intervention will be offered at the earliest point. Any member of staff who is made aware that a student has self-harmed, or is contemplating self-harm or suicide, will record and report the matter to the DSL as soon as possible as with any other safeguarding concern.

A safety plan will be developed for any student at risk of suicide.

Fabricated or induced illnesses

Staff at Altwood School are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

There are many ways that the parent or carer may fabricate or induce illness in a child:- ● lying about their child's symptoms

- deliberately contaminating or manipulating clinical tests to fake evidence of illness. For example, by adding blood or glucose to urine samples, placing their blood on the child's clothing to suggest unusual bleeding, or heating thermometers to suggest the presence of a fever
- poisoning their child with unsuitable and non-prescribed medicine
- infecting their child's wounds or injecting the child with dirt or poo
- inducing unconsciousness by suffocating their child
- not treating or mistreating genuine conditions so they get worse
- withholding food, resulting in the child failing to develop physically and mentally at the expected rate.

The very presence of an illness can act as a stimulus to the abnormal behaviour and also provide the parent with opportunities for inducing symptoms.

Fabricated or induced illness is most commonly identified in younger children. Although some of these children die, there are many that do not die as a result of having their illness fabricated or induced, but who suffer significant long term physical or psychological health consequences. Fabrication of illness may not necessarily result in a child experiencing physical harm, but there may be concerns about the child suffering emotional harm. They may suffer emotional harm and / or disturbed family relationships as a result of an abnormal relationship with their parent.

Staff at Altwood School will record and report any concerns about a child who might be experiencing fabricated or induced illness to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral or consult with the SPA as with any other child protection concern.

The Royal College of Paediatrics and Child Health (RCPCH) has issued updated guidance:

<https://childprotection.rcpch.ac.uk/resources/perplexing-presentations-and-fii/>

Checking the identity and suitability of visitors

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school.

The names of the DSL and deputies are clearly advertised in the school.

On arrival at the school, all visitors are presented with a lanyard when signing in and a summary of the Safeguarding Policy and evacuation procedure. Visitors will be expected to sign in and out via the office visitors log and to display a visitors' badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

All visitors to the site must read the outline version of the Safeguarding Policy and acknowledge receipt of it before being issued with a visitors' badge.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

Contact the main parent/carer of the child. If this is unsuccessful will then contact the next parent/carer in order of priority as given by the parent/carer during admission to our school.

If contact cannot be made, we will contact social care to either raise the concern as part of our whole school safeguarding approach or to communicate with the current allocated social worker the child is being supported by through social care. The child will be admitted into the care of the local authority if parents/carers cannot be found.

Police will be phoned to inform them of non-collection to gain further support should the above prove unsuccessful.

All records of this will be recorded through our online safeguarding portal CPOMs with all details added to support any further investigation required.

In the event that a child remains on the school premises they will be monitored by two qualified practitioners until the above is concluded.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will complete a full search of the premises including checking with the pupil's friends to see if they know their whereabouts, checking medical and reception who will check the signing in and out book.

A member of the senior leadership team will be informed alongside the DSL. All adults and pupils will be asked calmly if they can tell us when they last remember seeing the pupil.

The doors, gates [and CCTV records] will be checked for signs of entry/exit.

If a pupil is still missing (or we know they have left site), a member of the senior leadership team or DSL will contact the parent/carer and explain what has happened, and what steps have been put in place. The parent/carer will be asked to try contacting the pupil and then come into school.

A member of the senior leadership team will contact and notify the police – the school will then co-operate fully with any Police Investigation.

All records of this will be recorded through our online safeguarding portal CPOMs with all details added to support any further investigation required.

Appendix 3: Allegations against staff and low-level concerns-procedures

This policy is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If there is any doubt as to whether a concern meets the harm threshold, the Headteacher (or their designated representative) will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. The case manager will be appointed by the Headteacher (or the CEO if the allegation relates to either a headteacher or a member of the Central Trust Team or the Chair of the Trust Board if the allegation relates to the CEO). The case manager will be identified at the earliest opportunity.

Headteachers will inform the CEO of any investigations.

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

If we receive an allegation of an incident happening while an individual or organisation was using the trust premises to run activities for children or the allegation relates to a former member of staff, we will follow this policy and our safeguarding policies and inform our LADO.

Suspension of the accused until the case is resolved

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

The decision to suspend will be taken by a Headteacher in consultation with the CEO (or CEO if the allegation relates either to a headteacher or member of the Central Trust Team or the Chair of the Trust Board if the allegation relates to the CEO).

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

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

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

If in doubt, the Headteacher, CEO or Chair of the Trust Board will seek views from the trust's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority at their earliest convenience, preferably within 24 hours. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Ask the Headteacher, CEO or Chair of the Trust Board, as appropriate, to consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and Headteacher and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, in conjunction with the Headteacher, CEO or Chair of the Trust Board, record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were

rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the trust and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation. This decision should be taken with the Headteacher (or CEO/Chair of the Trust Board).
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- We have a duty of care to our members of staff. We will act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the LA or the police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for support. They may also be given access to welfare counselling or medical advice.
- The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care will be taken when employees are suspended, to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the trust or school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the trust or school, while the trust or school carries out the investigation
- We will involve the agency fully, but the trust or school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within one working week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days and our staff disciplinary policy will be followed

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager and Headteacher (CEO or Chair of the Trust Board, where appropriate) will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the trust will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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

Learning lessons

After any cases where the allegations are *substantiated*, the case manager and/or Headteacher (or CEO or Chair of the Trust Board, where appropriate) will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager and/or Headteacher (or CEO or Chair of the Trust Board, where appropriate) will consider the facts and determine whether any improvements can be made.

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold as set out in section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

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

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

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

If the low-level concern relates to a Headteacher or a member of the Central Trust Team the CEO will collect the evidence and determine any further action. If the low-level concern relates to the CEO the Chair of the Trust Board or their appointed representative will collect the evidence and determine any further action.

Record keeping

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

Records will be:

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

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

References

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

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

Appendix 4: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Students

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk 0800 1111
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Kooth: www.kooth.com

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NSPCC: nspcc.org.uk 0800 0280285 help@nspcc.org.uk
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- RBWM LSCB: www.rbwmsafeguardingpartnership.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour based Violence

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentsinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Appendix 5: Operation Encompass Safeguarding Statement

The schools in our Trust are part of Operation Encompass.

Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse.

Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

Operation Encompass means that the police will share information with our schools about all police attended Domestic Abuse incidents which involve any of our children PRIOR to the start of the next school day. The notification informs us about the context of the incident and includes the Voice of the Child.

Once a Key Adult (DSL) and their deputy/ies (DDSLs) have attended either an Operation Encompass briefing or have completed the free National Online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other staff to enable them to understand how to support a young person following a referral. All staff are encouraged undertake the online training.

Our DSL undertook training on 24th July 2025.

Our DDSLs undertook training on various dates from 23th August 2025 – 1st October 2025

Our Safeguarding Governor undertook training on 17th September 2025

Our parents are aware through the school website that we are an Operation Encompass school.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information on CPOMS.

The Key Adult/s have led training for all staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children.

Our schools have also discussed how we can support our children who are experiencing Domestic Abuse on a day-to-day basis and particularly following the Operation Encompass notification.

We have used the free Operation Encompass Handbooks to inform our thinking.

We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

We have used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken by us.