


Safeguarding including  
Child Protection policy

THE  
**C**  **MPASS**  
PARTNERSHIP OF SCHOOLS

**Date of Last Review:** July 2025

**Agreed by Trustees:** August 2025

**Disseminated to Local School Committees:** September 2025

**Shared with all Staff:** September 2025

**Frequency of Review:** Annually, or earlier if required

**Date of Next Review:** Summer 2026

<b>Name of Headteacher:</b>	David Guy
<b>Name of Designated Safeguarding Lead for Child Protection:</b>	David Guy
<b>Name(s) of Deputy Designated Safeguarding Leads for Child Protection:</b>	Jo O'Donnell and Elda Musa
<b>Name of Designated Teacher for Looked-after Children:</b>	Jo O'Donnell
<b>Name of IT manager/person in charge of E-Safety:</b> <i>(Note; KCSIE requires DSL to have lead responsibility for understanding the filtering and monitoring systems and processes)</i>	Jo O'Donnell
<b>Name of Governor for Safeguarding/Child Protection:</b>	Miranda Williams
<b>Name of Chair of Governors:</b>	Miranda Williams
<b>Name and contact details of Royal Borough of LADO:</b>	Sadie Bates 0208 921 3930 (mobile 07561116174) <a href="mailto:Childrens-LADO@royalgreenwich.gov.uk">Childrens-LADO@royalgreenwich.gov.uk</a>
<b>Name and contact details of Royal Borough of Greenwich Schools' safeguarding Officer:</b>	Laura Lumbis 0208 921 3930 (mobile 07896781040)
<b>Name and contact details of Royal Borough of Greenwich safeguarding engagement service leader for schools</b>	Claire Burns 020 8921 5583 <a href="mailto:Claire.burns@royalgreenwich.gov.uk">Claire.burns@royalgreenwich.gov.uk</a> Mobile (07561 116237)

**Out of hours contact details: emails**

**Trust Lead for Safeguarding:**

Holly Gibson – [hgibson@compassps.uk](mailto:hgibson@compassps.uk)

**Named Trustee Responsible for Safeguarding:** Nathalie Fitzgerald -

[nfitzgerald@compassps.uk](mailto:nfitzgerald@compassps.uk)

**CEO:**

John Camp – [jcamp@compassps.uk](mailto:jcamp@compassps.uk)

**Child Protection Statement**

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We endeavor to provide a safe and welcoming environment where children and adults feel respected and valued. We maintain an attitude of '**it could happen here**' where safeguarding is concerned and promote a culture of openness where children and adults are able to talk and are listened to.

This policy will provide staff, volunteers, governors and trustees with the framework they need in order to keep children safe and secure in our school. It will be used to inform parents and carers of how we will safeguard their children whilst they are in our care.

This policy takes into account the locally agreed procedures. This policy takes account of the guidance to KCSIE 2025.

The policy provides information regarding different types of abuse, links to statutory documentation and outlines our procedures which ensure our children receive effective support, protection and justice.

**Equality statement**

Some children have an increased risk/ vulnerability to abuse, and additional barriers can exist for some children with respect to recognising or disclosing abuse. 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 (SEN) or disabilities
- Are young carers
- Children who are missing from education, home or care
  - Children whose parent/carer has expressed an intention to educate from home
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality, including those questioning their gender identity.
  - Have English as an additional language
  - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence and exploitation

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation / exploitation
- Are asylum seekers or at risk of modern slavery / trafficking
  - Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after or privately fostered

## **Introduction**

The procedures contained in this policy apply to all staff, governors and Trustees. They are consistent with local authority agreed multi-agency arrangements put in place by the three safeguarding partners (health, social care and police).

We take seriously our responsibility to protect and safeguard the children in our care and have updated this policy to meet the requirements within updated statutory guidance documents. These documents outline the responsibilities of schools, colleges, independent schools, academies and free schools (by virtual of their funding agreement) in carrying out their duties to safeguard and promote the welfare of children by ensuring that "mechanisms are in place to assist staff to understand and discharge their role and responsibilities".

We will support the pupils in their understanding of staying safe when using new technology and personal safety through the broad curricular offer and the PHSE curriculum.

## **CONTENTS**

1. Purpose and Aims
2. Statutory Framework
3. Safeguarding Training
4. The Head Teacher's Roles & Responsibilities re Safeguarding
5. Designated Safeguarding Lead for Child Protection's Roles & Responsibilities
6. The Local Governing Body's Roles and Responsibilities re Safeguarding
7. The Roles & Responsibilities of all Staff within School
8. Early years safeguarding and welfare
9. Early Help Guidance
10. When to be concerned (including the types of abuse covered & the signs of abuse)
11. Dealing with a Disclosure (including protocol for staff when there are allegations or incidents of abuse; includes a requirement for all verbal notifications to the designated person for safeguarding to be confirmed by dated written communication)
12. Confidentiality
13. Communication with Parents
14. Record Keeping
15. Dealing with Allegations against School Staff / Volunteers
16. Allegations against other children
17. Safeguarding and mental health
18. Domestic Abuse
19. Mobile technology
20. Online Safety
21. Attendance
22. Monitoring and Evaluation

23. Complaints

24. Related Policies and Procedures

Appendices:

Appendix 1: Types and Indicators of Abuse

Appendix 2: Statutory legislation guidance and advice reference including ‘

Appendix 3: Record keeping and referral guidance

Appendix 4: Brook Sexual Behaviours Traffic Light Tool

Appendix 5: DSL JD

Appendix 6: Child on Child sexual abuse risk assessment

Appendix 7: LADO flow chart

## 1. Purpose and Aims

The Compass Partnership of Schools fully recognises its responsibilities for safeguarding children including those in need of protection.

### Aims

To provide staff, volunteers, governors and Trustees with the training and framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities and ensuring that children grow up in circumstances consistent with the provision of safe and effective care .

- To ensure consistent good practice across our schools.
- To prevent the impairment of children's mental and physical health or development
- To demonstrate our commitment to protecting children from maltreatment, whether that is within or outside the home, including online.
- To ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare. Providing help and support to meet the needs of children as soon as problems emerge

### Principles and values

- Children have a right to feel secure and cannot learn effectively unless they do.
- All children have a right to be protected from harm and to have the best outcomes.
- All staff, volunteers, governors and Trustees have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community including online, taking into account *contextual safeguarding*, in accordance with the guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the school will work openly with parents and carers as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

The Compass Partnership will:

- ensure safer recruitment procedures are robust and in line with national legislation and a strict staff code of conduct is promoted.
- ensure a suitably trained workforce who are confident to implement the outlined procedures for identifying and reporting cases, or suspected

cases, of abuse.

We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- raise awareness of child protection issues and equip children with the skills needed to keep themselves safe, including those for online safety;
- 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;
- promote opportunities across the curriculum for children to develop the skills they need to recognise and stay safe from abuse.

## 2. Statutory Framework

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(KCSIE\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#).

We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

More specifically, we will:

- ensure we have a Designated Senior Safeguarding Lead (DSL), and Deputy Designated Lead for Safeguarding, who have received appropriate training and support for their roles and take responsibility for understanding filtering and monitoring systems and processes;
- ensure we have a nominated governor responsible for child protection;
- ensure every member of staff (including temporary and supply staff and volunteers) and governing body knows the name and role of the designated senior lead for child protection and their deputy;
- have a comprehensive induction policy in place specifically outlining the school safeguarding policy; code of conduct; behaviour for learning; attendance policy and identify the role of the DSL.
- ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL and have signed that they have read and understood key documentation:
  - **Staff who work directly with children: Keeping Children Safe in Education 2025 part 1 and Annex B.**
  - **Staff who do not work directly with children: Keeping Children Safe in Education 2025 Annex A and B**

- ensure staff awareness of systems which support safeguarding, including the safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour and relationships policy, online safety policy, acceptable use policy, intimate care policy Prevent policy, Whistle blowing policy, Looked after children policy, the safeguarding response to children who go missing from education and clear understanding of the Filtering and Monitoring standards.
- Ensure each setting and the Trust as a whole creates the right culture so staff feel comfortable discussing safeguarding matters in and outside of work, including online elements as part of the ongoing vigilance
- ensure staff awareness of the early help assessment process 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
- ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school;
- notify Social Care immediately (on the first day of absence) if there is an unexplained absence of a child on a Child Protection Plan;
- contact the child's social worker directly if there is an unexplained absence of a child who is Looked After. This may then trigger actions identified in the "Joint Police and Social Care Protocol for Dealing with Children Missing from Care";
- develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences;
- keep detailed, accurate, secure records of concerns about children, even where there is no need to refer the matter immediately;
- have procedures in place to reassess concerns when a child's situation fails to improve;
- ensure all safeguarding and child protection records are kept securely, separate from the main pupil file, and in locked locations, including electronic storage;
- follow the procedures set out in section 14 of this document, if an allegation is made against a member of staff or volunteer;
- ensure safer recruitment practices are always followed including ensuring shortlisted candidates are informed that an online search may be conducted as part of Due diligence checks. *See policy for further details*

### **3. Safeguarding Training**

All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively including when pupils are online.

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training and support to understand filtering systems in place and the necessary monitoring. In addition to the formal training, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

Any newly appointed DSL's/Deputy DSL's will attend full DSL training before taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.

All Trustees and local governors receive training about safeguarding and child protection (including online safety) at induction. This is updated annually.

The training ensures Trustees and governors:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Review the DFE's filtering and monitoring standards:  
<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges> and ensuring DSLs take responsibility for and that all staff understand their roles in relation to understanding filtering and monitoring systems and processes.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding both online and offline and for those pupils absent for education for prolonged periods.

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

The DSL will retain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read and understood the sections of Keeping Children Safe in Education 2025 in accordance with their role.

All new members of staff will receive child protection training as part of their induction programme.

Briefings and updates on child protection and safeguarding procedures will be provided on a regular basis, at least annually, but more frequently when necessary, to ensure that all members of staff are familiar with any changes to the school policy

or in the national guidance materials as they occur.

At least one member of every appointments panel will have gained accreditation through Safer Recruitment training (statutory requirement). The school will ensure that there are always sufficient numbers of suitably trained staff or governors in post. Further details can be found in our safer recruitment policy

### Record of Training (Summary)

	<b>Staff/governor/Trustee name</b>	<b>Date</b>
Designated Safeguarding Lead <i>Including email address</i>	David Guy awcontact@compassps.uk	September 2025
Deputy DSL <i>Including email address</i>	Jo O Donnell awcontact@compassps.uk	September 2025
Prevent awareness	All Staff	June 2025
Filtering and monitoring	All staff	June 2025
Designated Teacher for looked-after Children	Jo O Donnell	June 2025
Governor safeguarding training	All Governors	September 2025
Safer Recruitment	HT/DHT/Office Lead	April 2024
Annual safeguarding/CP training for all staff	All staff	September 2025
Honour Based Violence (FGM, forced marriage)	All staff	June 2025
Child Sexual Exploitation (CSE)	All Staff	September 2025
Child on Child abuse	All staff	September 2025
Child criminal exploitation - county lines	All staff	September 2025
Prevent and extremism	All staff	June 2025
Online safety training	All staff	June 2025
First Aid	All Staff	December 2025
Positive Handling	Jo O Donnell/ Elda Musa/Toni Archer/Aga.Moczarska	March 2025

#### 4. The Head Teacher's Roles and Responsibilities re: Safeguarding

In line with the statutory guidance (KCSIE), the Head Teacher will ensure that systems and procedures to ensure all staff understand their role in safeguarding and promoting the welfare of children and promote a culture of vigilance. The Head Teacher will ensure:

- the policies and procedures adopted by the trust are fully implemented, and followed by all staff;
- The DSL takes responsibility for understanding the filtering and monitoring systems and processes in place in the school;
- Ensures that any allegations relating to an incident where an individual or organisation was using the school premises for running an activity with children are managed within the expectations outlined in this policy and the Local Authority Designated Officer (LADO) is informed.
- a clear and concise JD for DSL's is in place;
- the DSL is a member of the school's leadership team;
- sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children;
- all staff and volunteers feel able and comfortable to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies, where appropriate;
- induction procedures are robust and meet the requirements outlined in KCSIE (2025) ;
- a barred list check is completed and a risk assessment is in place ensure any individual who starts before a Disclosure Barring Service (DBS) certificate is received, is appropriately supervised;
- there are arrangements in place for DSL availability to cover any out of hours or out of term time activities taking place;
- procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns;
- the school is satisfied that any alternative provider used by the school has appropriate safeguarding procedures in place; including written confirmation that full safer recruitment procedures have been followed on all staff, clarity on where the children will be throughout school hours and the placement is reviewed every 6 weeks.
- Ensuring relevant staff ratios are met where applicable.
- Awareness and understanding that for some pupils elective home education can mean that some pupils are not in receipt of suitable education and ensure cases are followed up appropriately.

- Understanding of pupils who may be put at risk through multiple suspensions or who are at risk of being permanently excluded.

## **5. The Designated Safeguarding Lead for Child Protection's Roles & Responsibilities**

Broad areas of responsibility proposed for the DSL for child protection are:

- recognise how to identify signs of abuse, neglect and exploitation and when it is appropriate to make a referral to other agencies;
- refer cases of suspected abuse or allegations to the relevant statutory agencies (children's social care or the police);
- act as a source of support, advice and expertise to staff within the educational establishment;
- seek advice from and share information with relevant statutory agencies before seeking consent or informing parents of a referral. Where practicable, concerns should be discussed with the family and agreement sought for a referral to children's services **unless** this may, either by delay or the behavioural response it prompts, place the child at risk of significant harm. (Consideration will be given that by alerting parents or carers about a referral could potentially jeopardise a police or criminal investigation, DSLs should seek advice if this is the case.) Liaise with the head teacher or principal (where the role is not carried out by the headteacher or principal) to inform him or her of any issues and ongoing enquiries under section 47 of the Children Act 1989 and police investigations and ensure there is always cover for this role;
- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school's Safeguarding and child protection policy and procedures, especially new or part-time staff who may work with different educational establishments;
- ensure all staff have robust induction training covering child protection and are able to recognise and report any concerns about children's safety and welfare immediately they arise;
- ensure all staff are aware of the guidance 'What to do if you're worried a Child is being Abused';
- feedback and reassure staff who have raised a child protection concern;
- keep detailed, accurate, secure written records of all concerns, discussions and decisions, including the rationale for those decisions and for instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program
- maintain an up-to-date awareness of safeguarding developments and distribute these as appropriate to all staff in line with advice from the locally agreed multiagency arrangements;
- have undertaken Prevent Awareness training
- have clear understanding of their role in relation to filtering and monitoring, and online safety and ensure clear systems are in place and breaches are reported appropriately

- ensure that they and staff, use the DfE's data protection guidance for schools to help them comply with data protection law and develop policies and processes
- ensure the establishment's child protection policy and procedures are updated and reviewed annually and work with local governors and Trustees regarding this;
- ensure parents can see copies of the Safeguarding and child protection policy and procedures which alerts them to the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the establishment in this.
- where children leave the establishment ensure their child protection file is provided (with a receipt obtained) for any new establishment as soon as possible but transferred separately and securely from the main pupil file;  
See Appendix 6- DSL JD

Oversee and remain responsible for the safeguarding of any pupils placed with an alternate provision provider, to ensure that the placement meets the pupils needs.

## **6. Trustees and Governors: Roles & Responsibilities re Safeguarding**

Trustees are accountable for ensuring their schools have effective policies and procedures in place in accordance with KCSiE 2025 and for monitoring their school's compliance with them. They should ensure that an appropriate senior member of staff is designated to take lead responsibility for dealing with child protection issues, providing advice and support to other staff liaising with the local authority and working with other agencies.

In light of this statutory guidance Trustees will ensure that Local School Committees nominate a governor who will be responsible for Safeguarding and Child Protection and will liaise with the DSL on matters relating to Safeguarding and Child Protection.

Trustees will ensure that:

- governors and trustees use the DfE's data protection guidance for schools to help them comply with data protection law and develop policies and processes
- the Trust has a safeguarding policy and procedures in place that are in accordance with local authority guidance and locally agreed interagency procedures, and the policy is made available to parents on request;
- the Trust operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children;
- the Trust has procedures for dealing with allegations of abuse against members of staff and volunteers that comply with guidance from the local authority and locally agreed interagency procedures;
- the Trust has clear expectations that the same procedures would be used for any allegations received, that relate to an incident where an individual or organisation was using any school premises for running an activity for children
- a senior member of the school's leadership team is designated to take lead responsibility for dealing with safeguarding and child protection issues, providing advice and support to other staff, liaising with the local authority, and working with other agencies;
- the Designated Safeguarding Lead will undertake training to support inter-agency working (every two years);
- there is annual training for all staff to equip them to carry out their responsibilities for child protection effectively. Training materials are updated annually to reflect

changes in guidance and or local issues. Also, that all temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities;

- Additional training is provided where guidance changes or individual schools assess a need for further training. Aspects of safeguarding are added to meeting agendas on a regular basis
  - that all staff, trustees and governors read the appropriate sections of KCSiE 2025 in accordance to their role.
- an appropriate whistleblowing policy/procedure is in place and is reflected in staff training and staff behaviour policies (code of conduct) to encourage any staff member or volunteer to report concerns regarding safeguarding practice in school;
- there are clear systems and processes in place for identifying pupils with possible mental health problems, including routes to escalate and clear referral and accountability systems;
- that pupils are taught about safeguarding, ensuring online safety is a running and interrelated theme within the whole school approach to safeguarding
- that safeguarding policies and procedures cover all aspects of safeguarding, including those that may arise from essential remote learning as a result of illness and prolonged periods of absence or repeated absences / Persistent absence and those children missing in Education.
- all allegations or safeguarding complaints are appropriately investigated by a senior leader from within the school or trust and if necessary, by an independent investigator
- procedures to manage any safeguarding concern no matter how small, or allegations that do not meet the harm threshold (low level concerns) about staff members (including supply staff, volunteers, contractors and organisations using the school premises)
- Staff understand and follow the procedures set out within the policy
- the head teacher remedies without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to his/her attention;
- a member of the trust board is nominated to be responsible for liaising with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against the Headteacher (Contact details of the LADO are given in section 14.7);
- the Trustees review the safeguarding policy and the effectiveness of safeguarding procedures (at least) annually; or earlier if changes in guidance occur;
- With staff welfare in mind, the governing body will consider the necessity and appropriateness of arranging for 'safeguarding supervision' for DSL's within the school.

## **7. The Role & Responsibilities of all Staff within School**

All staff members and volunteers who work with children should read Keeping Children Safe in Education 2025 Part 1 and Annex B. Those who do not work directly with children should read Annex A and B of KCSiE 2025. They should be aware of the signs of abuse, neglect and exploitation (Appendix 1 attached) so that they are able to identify cases of children who may be in need of help or protection. Staff will sign a declaration to confirm they have read the guidance at the beginning of each year, this can be managed electronically.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding leads (DSL's) the behaviour and relationships policy, online safety policy acceptable use policy, intimate care policy Prevent policy, Whistle blowing policy, Looked after children policy and the safeguarding response to children who go missing from education or those persistently absent.

Staff members working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

Children with Special Educational Needs (SEN) and Disabilities or certain health conditions can face additional safeguarding challenges. Staff are aware of the additional barriers in identifying possible abuse, neglect and exploitation in these children. They recognise the need to;

- explore the reasons for changes in behaviour, mood and injury rather than assume it is related to the child's disability;
- understand that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs;
- overcome the barriers and difficulties in communication with these children.

All staff will ensure they are aware of their responsibilities for safeguarding and child protection in being alert to the signs of abuse, neglect and exploitation and of their responsibility to report and record any concerns. This means that they must:

- recognise that a disclosure may come directly from the child, or from a third party, e.g. friend, neighbour, other family member.
- Be aware a disclosure may be through the suspicion of staff based on a variety of signs, symptoms and knowledge of possible indicators of abuse, neglect and exploitation;
- Recognise that child on child abuse must be taken seriously and be appropriately reported;
- take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour (without promising they will not tell anyone);
- read carefully any documentation provided by the DSL to update their safeguarding training.
- Carefully review EHCP plans in partnership with Local authorities and parents for any pupils whose parents have expressed their intention to educate their child at home
- Read carefully the online safety policy

It is recognised that a child may disclose sensitive information at any time of the day, and in particular this may occur outside of normal lesson time, e.g. break periods or during before/after school club sessions. It is therefore important that **all** the staff are aware of the signs and behaviour which **may** indicate abuse, neglect and exploitation (see section 9 and Appendix 1).

All staff and volunteers have a duty to raise concerns about poor or unsafe practice

and potential failures in the school's safeguarding regime.

If you have concerns about a member of staff (including a supply teacher or volunteer or organisation using the school premises for running an activity for children), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the Trust lead for safeguarding CEO or the Chair of Trustees.

Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other **whistleblowing** channels are open to them:

- *The Local Authority Designated Officer*

*A regulated external body such as: The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).*

See Whistleblowing policy for further information

## **8. Early Years Foundation Stage Safeguarding & Welfare**

From September 2025, the EYFS safeguarding and welfare requirements introduced a suite of further protections to ensure children's safety and dignity across early years settings. Much of this is already part of the standard practice within our schools:

- Safer Recruitment & Staff Suitability

The Compass Partnership of Schools Safer Recruitment policy already specifies procedures for verifying the identity, qualifications, and employment history of prospective staff. This includes, two professional references—including one from the current employer or training provider and authored by someone with senior authority—must be obtained and verified before employment begins. Open references or those from family members are no longer acceptable. Any staff dismissed for safeguarding concerns must trigger a DBS referral, and new staff must not be unsupervised or counted in ratios until their suitability is confirmed. For further details please refer to the Safer Recruitment policy

- Designated Safeguarding Lead (DSL) & Training Standards

The EYFS settings within The Compass Partnership of Schools are all predominantly directly led by primary schools, thus the training level is already mandatory for all staff and the DSL for the school also covers the EYFS settings. Where Nursery settings have been outsourced, the school ensure there is a named **Designated Safeguarding Lead (DSL) and that all staff undertake safeguarding training annually**. The DSL must undergo training at least every **two years**, with additional **annual refresher training as needed**, and safeguarding policies must document both how training is delivered and how staff are supported to apply their learning in practice.

- Attendance, Absences & Emergency Contact Policies

The EYFS settings within The Compass Partnership of Schools are all predominantly directly led by primary schools, thus are covered within the Trust attendance policy, found on the school website. For any outsourced Nursery settings the school ensures the provider maintains a **written Attendance Policy**, shared with parents or carers, which details expectations for notifying absences and the provider's follow-up procedures. Settings should also hold and regularly verify **at least three emergency contact numbers** per child wherever possible.

- Safer Eating, Food Allergies & Choking Prevention

A staff member with a valid Paediatric First Aid (PFA) certificate is present whenever children are eating. It is standard practice for all Schools and Providers to obtain comprehensive information on children's dietary needs, allergies, and health requirements prior to admission. Staff are regularly trained in identifying allergy symptoms and emergency treatments (e.g., anaphylaxis, EpiPen use), including those in the Nursery Settings, and food should be prepared safely to minimise choking risks (such as cutting grapes lengthwise or grating carrots). All choking incidents requiring intervention are recorded, and staff should sit facing children during meals to monitor safety and prevent food sharing.

- Paediatric First Aid Qualification for Trainees

From September 2025, any students, volunteers (aged 17+), or apprentices (aged 16+) included in staff-to-child ratios must hold a valid Paediatric First Aid (PFA) certificate. An accredited training provider is chosen to deliver this training, ensuring consistent competency across all team members counted in ratios.

- Toileting, Nappy Changing & Children's Privacy

The Compass Partnership of Schools Intimate Care policy details the need to balance children's privacy with safeguarding oversight during toileting and nappy-changing routines. Providers should, for instance, use the adult's body or a privacy screen to shield the child from others, while still maintaining appropriate supervision to ensure safety.

- Whistleblowing & Reporting Channels

A written Whistleblowing Policy is in place at The Compass Partnership of Schools and is expected to be followed for any outsourced provisions. This policy outlines clear procedures for staff to raise concerns about unsafe or poor practice, with assurances of protection against retaliation. Staff are informed

about these channels and encouraged to speak up confidently.

- **Fostering a Culture of Safeguarding**

The Compass partnership of Schools is committed to every school and setting cultivating a child-centred safeguarding culture, where every practitioner, parent, and child is aware that safeguarding is a shared responsibility. This involves accessible reporting systems, ongoing professional development, and consistent reinforcement of safe practices in daily routines and Audit processes.

## **9. Early Help**

Early Help supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm and reduces the chance of problems getting worse. Early help is focused on breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Professionals should, in particular, be alert to the potential need for early help for a child who;

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;
- is showing early signs of abuse, neglect and exploitation.
- are absent from education / persistently absent

### **Early help assessment**

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Further information can be found from:

Greenwich Schools

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

Early Help consultation line 0208 921 2267 1- 4pm

[Early-help-refer@royalgreenwich.gov.uk](mailto:Early-help-refer@royalgreenwich.gov.uk)

Early Help preventions directory available on the GSCB website

## **10. When to be concerned**

All staff and volunteers must be aware that the main categories of abuse are:

Neglect  
Physical abuse  
Sexual abuse  
Emotional abuse  
Exploitation

All staff and volunteers must act in accordance with this policy if a child he/she presents with indicators of abuse, neglect and exploitation (see Appendix 1 for details).

## **11. Dealing with a Disclosure/Reporting concerns See (Appendix 3 flowchart)**

If any member of staff has a concern about a particular child in their care, they must immediately report their concerns to, and seek advice from the Designated Safeguarding Lead, or in their absence, the Deputy Designated Safeguarding Lead. Staff must record their concerns on 'My Concern'.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow referral, along with the role they might be expected to play in such assessment.

If a child discloses that he or she has been abused in some way the member of staff should:

- find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light;
- listen to what is being said without displaying shock or disbelief;
- do not make false promises which may not be able to be fulfilled and do not promise confidentiality;
- allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as "Tell me, and How did that happen";
- not criticise the alleged perpetrator;
- reassure the child that what has happened is not his or her fault;
- stress that it was the right thing to tell;
- explain what has to be done next and who has to be told;
- find out just enough to be sure of the need to refer, and keep any questions open rather than closed;
- make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned.
- record of disclosure via my concern / CPOMS

- Speak with the Designated Safeguarding Lead for Child Protection, without delay;
- Not disclose information to anyone other than the DSL unless told by them to do so.

The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child, but another child or an adult.

Education is a referrer, not an investigative agency for child protection matters. An incident may eventually end up as a court case and repeated recital.

When the DSL has been informed, he/she will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

**Greenwich**  
**MASH Consultation Line Tel- 020 8921 3172 or [mash-referrals@royalgreenwich.gov.uk](mailto:mash-referrals@royalgreenwich.gov.uk) contact**  
**LADO/Greenwich Safeguarding Coordinator for Schools.**

Referrals will be made as soon as possible by telephone **and the appropriate forms completed and sent at the same time.** Referrals to Children's Social Care must be made to the Multi Agency Safeguarding Hub (**MASH**)

**Greenwich**  
**Multi Agency Safeguarding Hub**  
**Children's Services'**  
**Safeguarding and Social Care, 1<sup>st</sup> Floor**  
**The Woolwich Centre,**  
**Wellington Street,**  
**Woolwich, London**  
**SE18 6HQ**

Additional referral guidance is provided in Appendix 3

## **12. Confidentiality**

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff / volunteers in school. All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the guidance 'Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers' (July 2018). It identifies seven golden rules for sharing information and remind practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

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 a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff/volunteer tells the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.

Staff / volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

### **13. Communication with Parents**

Parents and carers will be made aware of the school/service policy through published information and in initial meetings with parent and carers of new children.

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)

Trustees ensure this policy available to parents, carers and children through the school website. A hard copy is also available on request.

### **14. Record Keeping**

The Trust uses 'My Concern' to report and record safeguarding concerns. The security and storage meets all DfE approved guidance. Only DSL's have full access to the records within the system. Staff are only able to report or update concerns unless given additional access to an area via a DSL.

Hard copies of records that may have superseded the introduction of [electronic record keeping](#) or been passed on by another school, will be stored in a locked

cabinet accessed only by named designated persons. Copies of paper records may be uploaded to 'My Concern where safeguarding concerns persist.

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

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

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.

All records will be transferred separately from the child's main file and a receipt of delivery will be obtained.

The information contained will be regarded as confidential. Any request for access to the information by non-Local Authority Safeguarding Children's Board Agencies (e.g. Solicitor, investigating agent) will be referred to the Head teacher/Child Protection Designated Senior Person who will seek legal advice before acting and the Trust DPO.

All records of concern and multi-agency involvement should be kept separate from the child's academic records. They must be kept securely with access only for the DSL, Deputy DSL's and Head Teacher.

### **15. Dealing with Allegations against School Staff (see also Keeping Children Safe in Education part 4 for further details also flowchart in Appendix 3)**

An allegation is any information which indicates that a member of staff/supply teacher/volunteer/ individual / organization using the school premises for an activity with children may have;

- behaved in a way that has, or may have, harmed a child;
- possibly committed a criminal offence against or in relation to a child;
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children;
- behaved in a way contrary to the Staff code of conduct.

This applies to any child the member of staff / supply teacher/volunteer has contact with in their personal, professional or community life.

To reduce the risk of allegations, all staff, supply teacher and volunteers must be aware of safer working practice and must be familiar with the Government document, '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.*'

Any allegation should be reported immediately to the DSL or Head Teacher (unless the allegation concerns the Head Teacher see below). S/he should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised and the person must be advised that the concern will be shared on a „need to know“ basis only.

Actions to be taken include making an immediate accurate, written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record must be signed and dated.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Head Teacher will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO) for Education, who is

**Greenwich: Laura Lumbis** [childrens-lado@royalgreenwich.gov.uk](mailto:childrens-lado@royalgreenwich.gov.uk)

If the allegation meets any of the four criteria set out above then the Head Teacher shall contact the LADO (Education) without delay, and provide the LADO with written confirmation of the allegation.

The Head Teacher shall, as soon as possible, **following briefing** from the LADO inform the subject of the allegation.

If there is an allegation or concerns raised against the Head Teacher, then CEO or Trust Safeguarding Lead will be contacted, alternatively the Trust Whistle Blowing Officer or Chair of Trustees in their absence.

**CEO – John Camp: [jcamp@compassps.uk](mailto:jcamp@compassps.uk)**

**Trust Safeguarding Lead – Holly Gibson: [hgibson@compassps.uk](mailto:hgibson@compassps.uk)**

**Trust Whistle blowing Officer – Michael Green: [mgreen1@compassps.uk](mailto:mgreen1@compassps.uk)**

**Chair of Trustees – Susan Skidmore: [sskidmore@compassps.uk](mailto:sskidmore@compassps.uk)**

In the event of allegations or concerns against the Head Teacher the CEO (or Chair of trustees) will contact the LADO, whose contact details are given in 14.7 above.

### **Low-level concerns**

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

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

Report all low level concerns to your headteacher. Where the concern is about the headteacher report to trust leads as outlined above

For more information see the Handling allegations against staff policy.

## **16. Allegations of abuse made against other children**

This policy recognises that children are capable of abusing their peers. Staff are aware that any allegations will be investigated appropriately by reporting concerns to the DSL and will never be tolerated or passed off as “banter” or “part of growing up”.

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

Victims of child on child abuse will be supported as for any other form of abuse and in their best interests.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour and relationships 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
- Is violent
- 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 sharing of nude or semi-nude images, sexually inappropriate pictures or videos .

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will 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 will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the Children and Adolescent Mental Health services (CAMHS), if appropriate

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring trusting secure relationships are at the heart of all we do and pupils know they can talk to staff confidentially
- Ensuring staff are trained to understand 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

Where child on child sexual abuse has occurred schools will undertake a risk assessment to ensure appropriate support and safety measures are in place to ensure both pupils are able to feel safe and supported

Relationships sit at the heart of our behaviour and relationships policy. Children are encouraged to share concerns with a trusted adult. This is reinforced through the relationships and health curriculum.

See Appendix 7: Child on Child sexual abuse risk assessment

Sharing of nude and semi-nude images

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL:

- If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the pupils involved (if appropriate).
- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents 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.

#### Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nude and semi nude images as part of our Relationships and Health and Computing curriculum. Teaching covers the following in relation to the sharing of nude and semi nude images:

- 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

### **17. Safeguarding and 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.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and refer to a DSL

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

Immediate concerns with regard to the mental health and wellbeing of pupils must be referred to the schools **Youth and child mental health first aider**, who will offer immediate support and sign post for further help.

The Department for Education guidance on [mental health and behaviour in schools](#) provides further information

### **18. 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, neglect and exploitation. 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 – for example, the impact of all forms of domestic abuse on children.

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.

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.

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

[Operation Encompass](#) – provides a wealth of resources to support

### **19. Mobile technology**

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 members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. Please see staff code of conduct for further details

### **20. Online Safety – Please refer to the Online Safety policy**

Regularly training ensures staff have a good understanding of all aspects of online safety, including the Four C's of online risk and how misinformation, disinformation (including fake news) and conspiracy theories sit within these. Further references can be found in [Educate Against Hate - Prevent Radicalisation & Extremism](#).

Staff must refer online safety concerns to a DSL via the schools safeguarding procedures.

Our PHSE and computing curriculum places a great emphasis on teaching children how to use the internet safely and respectfully including how to manage any incidents that cause them concern.

Parents are supported to keep their children safe at home through regular parental training, sign posting to external support networks and sharing of advice sheets

The online learning platforms we use are safe and secure and can only be accessed by the child and class teacher

If online learning includes any form of live streaming/videoing teachers must:

- ensure parental consent has been obtained;
- be mindful of their surroundings, ensuring any personal photos etc are not in view
- consider background noise that may be heard by children
- ensure others who they may live with are not present in the room during lessons
- ensure they dress appropriately for school
- ensure they are in control of the screen
- save the video/chat content

*See online safety policy and Data protection policy and privacy notices policies for further details*

## **21. Attendance - Please refer to the Attendance policy**

We recognise the link between attendance and safeguarding children. Our attendance policy sets out our robust procedures for both ensuring good attendance and safeguarding children with an awareness that attendance can be impacted by mental health. This policy draws upon the statutory guidance 'Working Together to Improve School Attendance' 2024.

*See attendance policy for further details*

## 21. Monitoring & Evaluation

The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures including those for filtering and monitoring are in place, available to parents and reviewed annually lies with the Trustees. Further self-assessment tools and guidance such as Plan technology for your school, digital and technology standards, Cyber security standards and guidance on Generative AI also form part of the review process that informs this policy. This policy will be reviewed in line with the timescale and details set out on the front cover.

## 22. Complaints

### Managing Complaints Arising from Safeguarding Concerns – Process Overview

Safeguarding is a priority, and any concerns or complaints related to safeguarding are taken extremely seriously. The following outlines the process for managing such complaints:

- **Initial** **Acknowledgement**  
All safeguarding-related complaints will be acknowledged promptly and treated with sensitivity, discretion, and urgency.
- **Referral to Designated Safeguarding Lead (DSL)**  
The complaint will be immediately referred to the Designated Safeguarding Lead (or Deputy DSL) for review and initial assessment.
- **Assessment** **and** **Action**  
The DSL will assess the nature and seriousness of the complaint. If the concern meets the threshold for a safeguarding issue, appropriate actions will be taken, which may include:
  - Gathering relevant information
  - Consulting with external safeguarding agencies or local authority services
  - Initiating a formal safeguarding investigation, if required
- **Confidentiality** **and** **Support**  
Throughout the process, confidentiality will be maintained as appropriate, and all parties involved will be treated with respect. Support will be offered to those affected by the complaint.
- **Outcome** **and** **Communication**  
Once the investigation is complete, a summary of findings and actions taken will be shared with the relevant parties, within the bounds of confidentiality and legal guidance.
- **Escalation** **and** **Appeals**  
If a complainant is not satisfied with the outcome, they have the right to escalate the concern through the organisation's or local authorities formal escalation procedure.
- **Learning** **and** **Improvement**  
Where relevant, lessons learned will inform improvements in safeguarding practice and policy.

## 23. List of related policies/procedures

Anti-bullying policy  
Supporting Children with Medical Needs  
On-line Safety  
Acceptable use agreements  
Behaviour and Relationships policy  
Equalities policy  
Asthma  
Whistleblowing  
Safer Recruitment in schools  
Induction policy  
Drugs in school  
Staff Code of Conduct (staff behaviour policy)  
Intimate care policy  
Positive handling  
Prevent policy  
Wearable devices policy  
Sex and Relationships Education Policy (SRE)  
Attendance  
Health and Safety  
Curriculum Statement  
PHSE curriculum

## **APPENDIX 1: Types and Indicators of Abuse (to be read in conjunction with Keeping Children Safe in Education Part 1)**

**NB. This guidance is provided as a useful reminder of the types and indicators of abuse but should always be considered within the context of a comprehensive training programme and not as a substitute for more in depth consideration**

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### **Definitions of child abuse**

'Child abuse, neglect and exploitation' is a generic term encompassing all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm. Abuse can occur in a family, an institutional or community setting. The perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

### **1. Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. It may also be caused when a parent or carer feigns the symptoms or deliberately causes ill health to a child (now described as 'fabricated or induced illness').

**Possible indicators of Physical Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries including burns, particularly if they are recurrent
- Improbably excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

### **2. Emotional Abuse**

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

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

**Possible indicators of Emotional Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical and/or mental and/or emotional development lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

### **3. Sexual Abuse**

Sexual abuse and exploitation involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Possible indicators of Sexual Abuse** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD \*  
Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

#### **4. Neglect**

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

**Possible indicators of Neglect** - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging
- Poor attendance / CME / Children absent from education

## **Additional safeguarding issues**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy)

### **Honour Based Violence**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### **FGM mandatory reporting duty**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases.

Mandatory reporting of female genital mutilation procedural information can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

### **Possible indicators of Female Genital Mutilation (FGM)**

- Holiday requests made to school for significant lengths of time (Pre warning)

- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties, including marriage before the age of 18 and/or 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, below the age of 18 for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines [Forced marriage resource pack - GOV.UK](#). School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufco.gov.uk](mailto:fmufco.gov.uk). See also Royal Borough of Greenwich Safeguarding Children Board website:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

### **Child Sexual Exploitation (CSE)**

Child Sexual Exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. The manipulation or '**grooming**' process involves befriending children, gaining their trust, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

### **Possible indicators of CSE Child Sexual Exploitation (CSE)**

- Inappropriate sexual or sexualised behaviour
- Repeat sexually transmitted infections
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends

- Getting in/out of different cars driven by unknown adults
- Going missing from home or care
- Having older boyfriends or girlfriends
- Associating with other young people involved in sexual exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Drug or alcohol misuse
- Getting involved in crime
- Injuries from physical assault, positive handling (physical restraint), sexual assault

### **Children missing from Education / Absent for prolonged periods of time and/or repeatedly. Please refer to the attendance policy**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect which may include sexual abuse or exploitation and child criminal exploitation including county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. The law requires all schools to have an admission register and with the exception of schools where pupils are boarders, an attendance register. All pupils must be placed on both registers. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures

#### **Children are considered to be missing education if they:**

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer is unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she know his/her parent/carer has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The school must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

#### **Private fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a **private arrangement made between a parent and a carer**, for 28 days or more. Close relatives are defined

as stepparents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity). To help keep children safe and support families, all parents and private foster carers must **notify MASH** of care arrangements for children so they can ensure a child is well cared for. If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important you share this information in case a child is at risk of harm.

### **Extremist ideology, radicalisation and terrorism**

Children and young people can suffer harm when exposed to an extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

Radicalisation refers to the process by which a person comes to support or use of terrorism and forms of extremism / violence. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

### **PREVENT**

#### **Please refer to the Prevent policy**

Section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales is specifically concerned with schools (but also cover childcare)

The statutory "Revised Prevent duty guidance: for England and Wales" (for schools) summarises the requirements on schools in terms of four general themes:

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.

The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them

to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

### **Child Criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are periods of absence from school, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. 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; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst 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.

### **Child on Child abuse**

Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment / Violence; abuse in intimate personal relationships between children physical abuse such as hitting, kicking, shaking, biting, hair pulling, upskirting or otherwise causing physical harm; the sharing of nude and semi-nude images and initiating/hazing type violence and ritual; 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: 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).

**As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.** Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

### **Sharing of nude and semi-nude images**

Your responsibilities when responding to an incident

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

You must **not**:

- View, download or share 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.

All sharing of nude and semi-nude images incidents and the decisions made in responding to them will be recorded as per usual safeguarding procedures

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

*Information regarding the definition and signs of further safeguarding issues including homelessness, domestic abuse, children with family members in prison and children and the court system etc can be found in Annex B of Keeping Children Safe in Education 2025.*

## **APPENDIX 2**

**Statutory Guidance, legislation and advice includes:**

The Children Act 1989 & 2004  
The Education Act 2002 (section 175)  
The Education (Pupil Information) (England) Regulations 2005  
Keeping Children Safe in Education (2025)  
Dealing with Allegations of Abuse Against Teachers and Other Staff  
Working Together to Safeguard Children (August 2018)  
Sexual violence and sexual harassment between children in schools and colleges (May 2018)  
Searching, screening and confiscation (January 2018)  
What to do if you're worried a child is being abused (March 2015)  
Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)  
Designated teacher for looked-after and previously looked-after children (February 2018)  
UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017)  
Procedures set out by the Greenwich Safeguarding Children Board.  
Children Missing Education, September 2016  
London Child Protection Procedures, May 2018  
Children & Families Act , 2014  
Cyber security standards for schools and colleges (March 2022)  
Keeping Children safe in and out of school settings (October 2020)  
Filtering and monitoring Standards (March 2023)

**Note: All staff** must read and be assisted to understand and discharge their roles and responsibilities set out in **Part one** of Keeping Children Safe in Education 2023. Additionally, Annex A provides further information which also should be read by school staff and governors.

Other useful documents include:

Ofsted: Inspecting safeguarding in early years education and skills.

### **APPENDIX 3: Record Keeping and Referral Guidance**

It is essential that school keeps clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken.

Child protection information will be kept in separate files by the designated Lead and will only be discussed with staff on a need to know basis. Staff need to know when a child is at risk and what plan has been decided by case conference but may not need to know all the confidential details.

All records, notes and observations made by class staff as part of ongoing monitoring of children on the child protection register or causing concern, must be completed via 'My Concern'. All child protection conference minutes must be uploaded to My Concern

### **Initial Concerns**

Initial concerns, incidents or disclosure by a child must be reported to the DSL. If you feel the child is at immediate risk from harm or you are unsure about the need to report, please speak to a DSL immediately. Concerns must be reported using My Concern. Body Maps are accessible via reporting page, this should be used to record injuries/marks/bruises.

Please ensure that the following information is recorded:  
time, date, place and people who were present exact details of what was said the by the child and/or others (no interpretation or opinion) the child's emotional or physical condition details of the behaviour(s) causing concern and the context in which it occurred.

Details of injuries, marks or bruises - the position of these must be marked on the appropriate body drawing and suitably annotated to provide further detail (number, length of marks, description of marks, colour of marks/bruises etc.).

Other details which you feel are relevant - including information about previous incidents which may not have been reported but now seem relevant

### **Using My Concern**

All staff have a unique login. Username is your school email address, your password has been set by you when you received an invite to the system

- Upon logging on you have the option to report or update a concern
- Click on 'report a concern'
- The page will take you through the reporting process using a series of drop-down boxes
- If you wish to add a body map click on the icon for 'body maps' and click to add details of marks
- Once complete click the 'Submit Concern' button. Email alerts will be sent to the DSL
- Follow up the concern in person immediately if a child is at immediate risk of harm or as soon as possible if concerns are not deemed to be high level. If unsure always seek advice immediately
- Should you have any difficulty in reporting information via My Concern please see a DSL immediately
- It continues to be an expectation that you follow up the concern to ensure it has been acted upon

Training on the use of My Concern will be updated annually as part of the school safeguarding refresher. The use of My Concern will be addressed as part of staff induction.

### **Ongoing Concerns/Monitoring**

Staff in regular contact with a child may be required to keep a running record noting information about particular aspects of a child's behaviour, physical and/or emotional condition or remarks they may make - either because concerns are ongoing or as part of a child protection plan.

These need to be recorded on 'My Concern' using the 'Update a Concern' tab.

### **Referrals**

The DSL must keep detailed, contemporaneous notes via My Concern of:

- discussions with staff;
- discussions with the child;
- discussion with parents;
- information provided to social services;
- decisions taken.

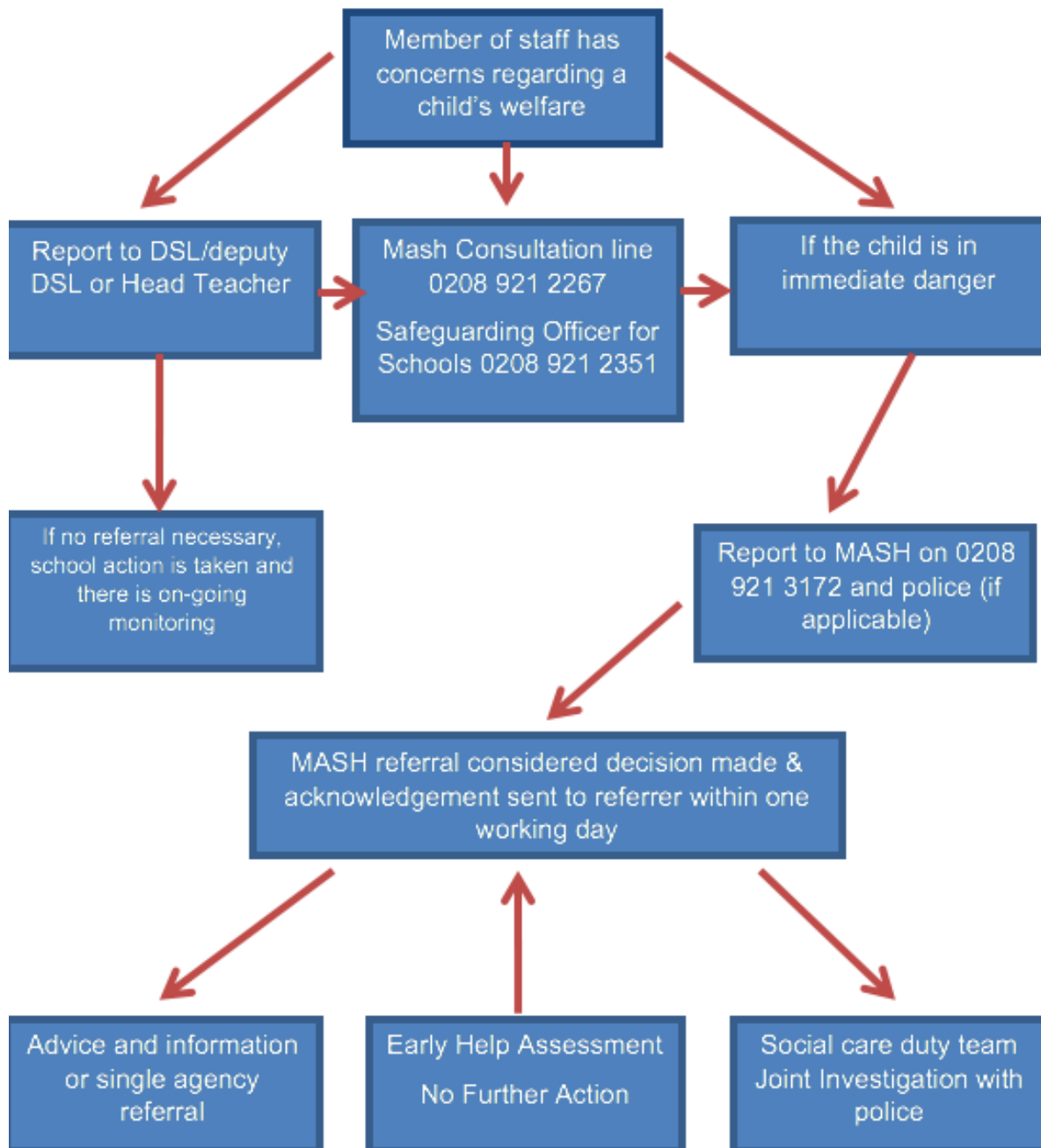
The DSL will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

### **Reports for Child Protection Conferences/Core Group Meetings**

Reports for child protection conferences or core group meetings must be written on the agreed pro-forma (copy attached). They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns. They should provide clear factual information. Staff should be aware that these reports will be made available to parents at the child protection conference. Information from My Concern can be transferred as a PDF

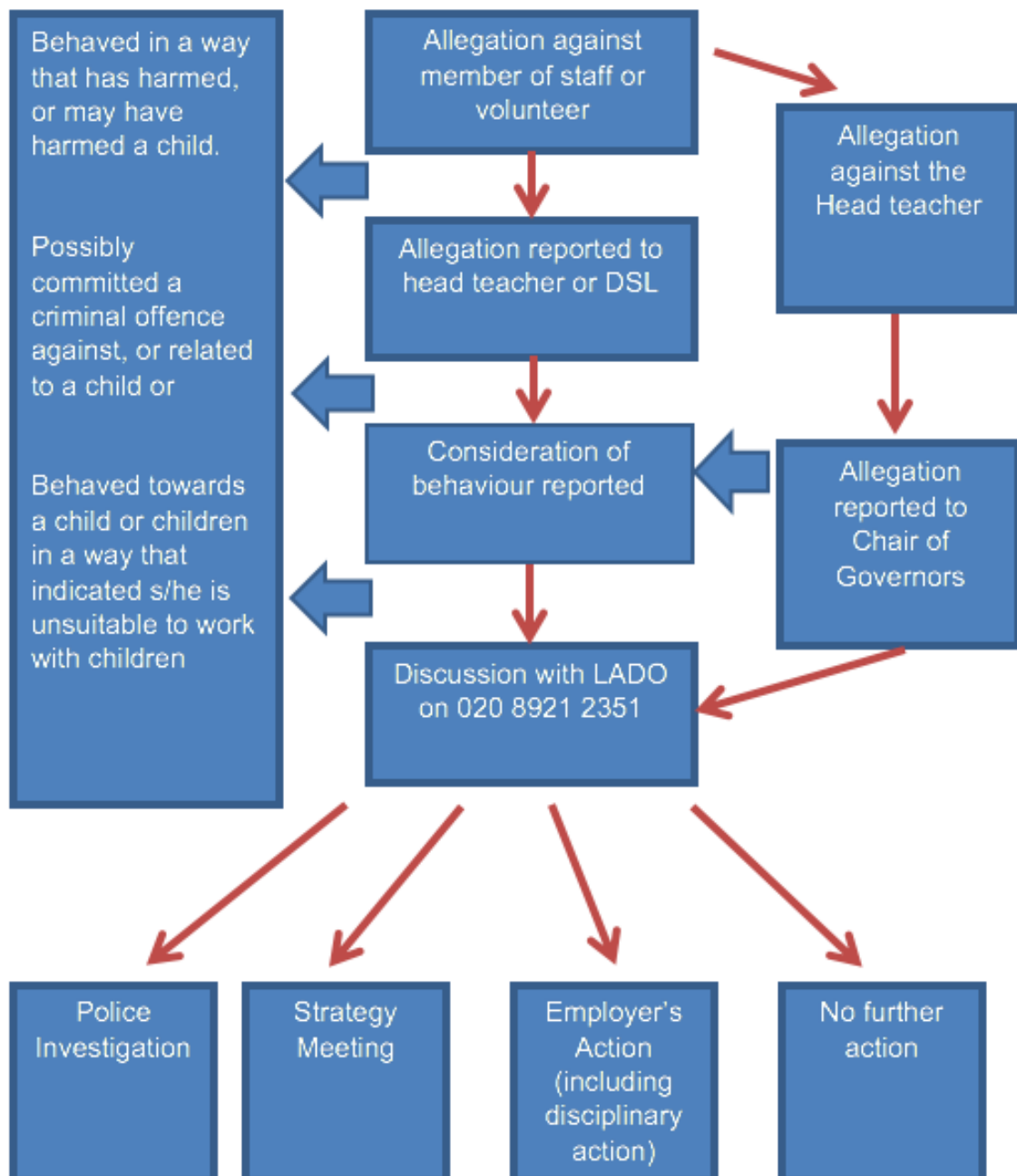
**Appendix 3 continued: Reporting concerns about a child**

**Flow Chart for Reporting Concerns**



**Appendix 3 continued: Reporting allegations against school staff/volunteers**

**Managing Allegations against Staff and Volunteers**



## APPENDIX 4: Brook Sexual Behaviours Traffic Light Tool

### Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

#### Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

#### Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

#### Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

## Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

### Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

### Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

## Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

### Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

### Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health. (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

Limited Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 703015. Registered Charity in Scotland, number SC045788.

## Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult-only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health. (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

Limited Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 703015. Registered Charity in Scotland, number SC045788.



## **Appendix 5: Designated Safeguarding Lead (DSL) and Deputy DSL Job Description**

The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

### **Summary of role:**

- To take lead responsibility for all safeguarding and child protection matters arising at the School and to support all other staff in dealing with any child protection concerns that arise
- To be given the resources, status and authority within the School to carry out the duties of the post including where appropriate, supporting and directing other staff to safeguard and promote the welfare of children
- Promoting and safeguarding the welfare of children and young persons for who you are responsible and with whom you come into contact
- To be available for staff to discuss any safeguarding concerns
- To be responsible for ensuring appropriate filtering and monitoring remains in place and all breaches are reported.

### **LINE MANAGEMENT DUTIES AND RESPONSIBILITIES:**

The Designated Safeguarding Lead will have line management responsibility for the Deputy Designated Safeguarding Lead

### **Main Duties and Responsibilities**

#### **MANAGING REFERRALS**

To take lead responsibility for:

- Referring all cases of suspected abuse of any pupil at the School to children's social care
- Supporting staff who make referrals to local authority children's social care
- Referring cases to the Channel programme (and supporting staff who make referrals) where there is a radicalisation concern
- Making referrals to the police where a crime may have been committed which involves a child
- Ensuring all staff are aware of filtering and monitoring systems in place to protect school systems and their responsibility to report any breaches.

To liaise with the headteacher in respect of police investigations or investigations under section 47 Children Act 1989 which involve the School.

To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies

### **RAISING AWARENESS**

- Ensure the trusts safeguarding policy and the implementation of it, is reviewed at least annually and is up to date and liaise with the Governors about this
- Ensure the safeguarding policy is available publicly
- Ensure that parents are aware that referrals about suspected abuse, neglect and exploitation may be made to children's social care and the School's role in this
- Maintain links with Greenwich Local Safeguarding Children Board to ensure staff are aware of training opportunities and the local policies on safeguarding; and
- Where children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file. The DSL is responsible for ensuring that reasonable steps are taken to effect secure transit and for obtaining confirmation of receipt from the new school or college
- Be aware of the need and perform the role of an 'appropriate adult' for children if required

*Under the Police and Criminal Evidence Act 1984 (PACE), police must ensure that an "appropriate adult" is present to provide support whenever they detain in custody or voluntarily interview anyone who:*

- *Is under 18 years old, or*
- *they have reason to suspect is a "vulnerable" person.*

*For children, this role is usually fulfilled by a parent or family member but it may also be someone provided by the local authority or a professional known to the child.*

### **PREVENTING RADICALISATION**

In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism the DSL has the following responsibilities:

- Acting as the first point of contact for parents, pupils, teaching and support staff and external agencies in all matters relating to the Prevent Duty
- Co-ordinating Prevent Duty procedures in the School

- Undergoing appropriate training on the Prevent Duty such as the Home Office 'Workshop to Raise Awareness of Prevent' (WRAP) training
- Undergoing appropriate training on the Channel programme
- Assessing the training needs of all School staff in relation to the Prevent Duty and implementing and maintaining an ongoing training programme for staff including induction training for all newly appointed staff and volunteers
- Maintaining an ongoing training programme on the Prevent Duty for all staff including induction training for all new employees and keeping records of staff training
- Monitoring the keeping, confidentiality and storage of records in relation to the Prevent Duty
- Liaising with the local Prevent co-ordinators, the police and local authorities and existing multi-agency forums in all necessary or appropriate circumstance relating to the Prevent Duty

## **TRAINING**

The DSL & Deputy DSL should receive appropriate child protection training every two years (and refresh their knowledge and skills through network meetings, email updates and documents on an ongoing basis) in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the School's safeguarding policy and procedures, especially new and part time staff
- To ensure that all staff have read and understood part 1 of KCSiE
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals

- Understand and support the school with regard to the Prevent Duty and provide advice and support to staff on protecting children from the risk of radicalisation
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, amongst all staff, in any measures the School may put in place to protect them

**You may also be required to undertake such other comparable duties as the Headteacher or Governors require of you from time to time.**

## Appendix 6: Child on Child sexual abuse risk assessment

Use this as an aide for you assess risks to the children involved in an incident of Child-on-Child sexual abuse.

This document can help you meet the recommendations set out in KCSiE 2025.

- “Child A” and “Child B” signify the children involved, rather than saying “victim” and “alleged perpetrator”. You should avoid assigning guilt until a formal investigation has been conducted by the appropriate authorities.
- Consider each question/consideration from the perspective of both pupils, and be sure to do this in collaboration with them. Also consider the impact on, and needs of, the wider school community, and record any concerns or actions in the most appropriate column.
- Work with your local multi-agency safeguarding team when conducting this risk assessment, and update it in response to any advice they provide. Some of the prompts may require input from other agencies.
- Keep track of the changes you make:
- Create a new copy of the document
- Update the version number at the top of the risk assessment
- Record what has changed in the update log (at the end of the document)
- Save the most recent version of the risk assessment in the appropriate places (for example, the child's safeguarding file)
- This should be a living document – you may need to update it as often as daily based on conversations with, and feedback from, the children and parents involved, feedback from staff, or information from the police and children's social care.

Area of Risk	Considerations	Child A	Child B	Notes	Actions
<p><b>Details of the incident</b></p> <p><i>Record details of the incident from the point of view of both children</i></p>	<ul style="list-style-type: none"> <li>• How serious is the incident? Was it a crime?</li> <li>• Do we need to make arrangements to limit contact between the children involved? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes)</li> <li>• How did the school find out about it?</li> <li>• Was it reported directly or by someone else with knowledge of the incident?</li> </ul>				
<p><b>Social risks</b></p>	<ul style="list-style-type: none"> <li>• Do the children share a peer group?</li> <li>• Are people in their friend group likely to take sides?</li> <li>• Do they both attend your school?</li> <li>• Do other people know about the incident? Do those people understand: <ul style="list-style-type: none"> <li>○ Who they can talk to if they have concerns about the people involved, or about their own safety and wellbeing</li> <li>○ The importance of confidentiality</li> <li>○ If, and how, they may need to be involved in any further investigations</li> </ul> </li> <li>• Are they likely to be the subject of gossip, bullying or further harassment?</li> <li>• Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)?</li> </ul> <p>Do they risk being alienated from their friend group(s) as a result of this incident?</p>				

<b>Physical risks</b>	<ul style="list-style-type: none"> <li>• Do they feel, or continue to feel, physically threatened by the other child?</li> <li>• Do you have reason to believe they pose a continued risk to the safety and wellbeing of the victim, or other pupils and staff?</li> <li>• Are they at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers)</li> <li>• Do they share classes/break times/etc.?</li> <li>• Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited?</li> </ul>				
<b>Environmental risks</b>	<ul style="list-style-type: none"> <li>• Do they live in a home where violence or abuse has occurred?</li> <li>• Do they live in or near an area or location known to police to be high risk for sexual harassment or assault?</li> <li>• Are they active on social media? If so, how? Do they know how to protect themselves from online grooming?</li> <li>• What activities do they take part in outside of school?</li> <li>• Are parents clear about: <ul style="list-style-type: none"> <li>○ How the school (and partner agencies) are handling the incident?</li> <li>○ Confidentiality?</li> <li>○ The conduct expected of them while an investigation is ongoing?</li> </ul> </li> </ul>				

Date	Updates Made	Reasons for updates	Updates made by
		REASONS FOR UPDATES	

APPENDIX 7: LADO flow chart Greenwich

