



**BREDON**  
SCHOOL

## **Safeguarding & Child Protection Policy**

**Prepared by:** The Central Team &  
Deputy Head (Pastoral & Safeguarding), Bredon School

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## 1. Introduction

Bredon School is owned and operated by Cavendish Education.

This policy is one of a series of school policies that, taken together, are designed to form a comprehensive statement of the school's aspiration to provide an outstanding education for each of its pupils and of the mechanisms and procedures in place to achieve this. Accordingly, this policy should be read alongside these policies. In particular, it should be read in conjunction with the policies covering equality and diversity, Health and Safety, safeguarding and child protection.

All of these policies have been written, not simply to meet statutory and other requirements, but to enable and evidence the work that the whole school is undertaking to ensure the implementation of its core values.

While this current policy document may be referred to elsewhere in Bredon School documentation, including particulars of employment, it is non-contractual.

In the school's policies, unless the specific context requires otherwise, the word "parent" is used in terms of Section 576 of the [Education Act 1996](#), which states that a 'parent', concerning a child or young person, includes any person who is not a biological parent but who has parental responsibility, or who has care of the child. Department for Education guidance, [Understanding and dealing with issues relating to parental responsibility, updated August 2023](#), considers a 'parent' to include:

- all biological parents, whether they are married or not
- any person who, although not a biological parent, has parental responsibility for a child or young person - this could be an adoptive parent, a step-parent, guardian or other relative
- any person who, although not a biological parent and does not have parental responsibility, has care of a child or young person

A person typically has care of a child or young person if they are the person with whom the child lives, either full or part-time, and who looks after the child, irrespective of what their biological or legal relationship is with the child.

The school contracts the services of third-party organisations to ensure regulatory compliance and implement best practices for:

- HR and Employment Law
- Health & Safety Guidance
- DBS Check processing
- Mandatory Safeguarding, Health & Safety, and other relevant training
- Data protection and GDPR guidance
- Specialist insurance cover

Where this policy refers to 'employees', the term refers to any individual who is classified as an employee or a worker, working with and on behalf of the school (including volunteers and contractors).

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

All outcomes generated by this document must take account of and seek to contribute to safeguarding and promoting the welfare of children and young people at Bredon School.

The policy documents of Bredon School are revised and published periodically in good faith. They are inevitably subject to revision. On occasions, a significant revision, although promulgated in school separately, may have to take effect between the republication of a set of policy documents. Care should therefore be taken to ensure, by consultation with the Senior Leadership Team, that the details of any policy document are still effectively current at a particular moment.

## 2. Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Miss Charmain Eaton, Deputy Head (Pastoral and Safeguarding)	01684 293156 / 07920 548531
Deputy DSL	Miss Jessica Shuttleworth, Interim Head of Thomas House	07494 419980
	Mr Josh Stafford, Director of Pastoral and Wellbeing, Head of Sharp House	07496 697595
	Mrs Natasha Deary, Head of Jarrett House	07903 477494
	Mr Alisdair Cradock, Head of Sixth Form	07398 623869
	Mr Rob Starr, Director of Boarding	07398 840423
	Mrs Vicki Miles, Director of Creative Arts	01684 293156
	Mrs Jill Blakeney, School Nurse	07943 271713
	Mrs Salena Fletcher,, Mental Health and Wellbeing Lead/Practitioner	07496 378107
	Mr David Hughes, Director of Sport	07984 562041
	Mrs Jackie Judd, Junior School Teacher, Prep School coordinator	01684 293156
Mr John Kerr, Senior House Parent	01684 293156	
Mrs Amy Leeke, SENCo	01684 293156	
Independent Listener	Mrs Linde Melhuish	07967 690412 / <a href="mailto:linde.melhuish@gamil.com">linde.melhuish@gamil.com</a>
Chair of governors	Mr Koen Claeys	07955 401315
Local authority designated officer (LADO)	Worcestershire County Council	01905 846221
Family Front Door (FFD)	Worcestershire County Council	01905 822666 (out of hours: 01905 768020)
Prevent helpline	West Mercia Police (Prevent Advice Line)	0121 251 0241
Whistleblowing helpline	NSPCC	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

### 3. Aims

The school aims to ensure that:

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

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

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
  - The [Children Act 1989](#) (and [2004 amendment](#)) provides a framework for the care and protection of children
  - Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
  - [Statutory guidance on FGM](#), which sets out responsibilities concerning safeguarding and supporting girls affected by FGM
  - The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
  - Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is concerning children
  - [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 concerning protecting people from the risk of radicalisation and extremism
  - The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
  - [The Equality Act 2010](#) makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteachers should carefully consider how they are supporting their pupils with these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
  - [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
  - [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the '2018 Childcare Disqualification Regulations') and [Childcare Act 2006](#), which set out who is disqualified from working with children
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## 5. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

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

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

Children include everyone under the age of 18.

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

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

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

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

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## 6. Equality statement

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

We give special consideration to children who:

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

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

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## 7. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

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

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

### 7.1 All staff

All staff will:

- Read and understand part 1, annex B and part 5 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the behaviour policy, the exclusion policy, the online safety policy, the role and identity of the designated safeguarding lead (DSL) and deputies, and the safeguarding response to children who go missing from education/who are absent from education. The early help assessment process and its role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- A child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Section 16 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

### 7.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Bredon School’s DSL is Miss Charmain Eaton, Deputy Head (Pastoral and Safeguarding). The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL can also be contacted out of school hours if necessary on 07920 548531.

When the DSL is absent, the first point of contact will be as follows (other deputies can be found on page 3 of this policy):

Mr Josh Stafford, Director of Pastoral and Wellbeing, Head of Sharp House (school day)- 07496 697595

Mr Rob Starr, Director of Boarding (boarding hours) - 07398 840423

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Bredon School’s Prevent Lead is Mr Alsidair Cradock, with support from Mrs Vicki Miles and Miss Charmain Eaton. They will ensure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputies are set out in their job description.

### 7.3 The local governing body

The local governing body will:

- Ensure that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a lead to monitor the effectiveness of this policy in conjunction with the board of Directors. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - This policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate (see Appendix 3).

All local governors will read **Keeping Children Safe in Education** in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

#### 7.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
  - Communicating this policy to parents/carers when their child joins the school, and via the school website
  - Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
  - Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)
  - Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
  - Ensuring the relevant staffing ratios are met, where applicable
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## 8. Confidentiality

### 8.1. Principles of Information Sharing

- Timely and appropriate information sharing is essential to effective safeguarding.
- Concerns about data protection or fears of breaching confidentiality **must never prevent action to safeguard or promote the welfare of children.**
- **The basic safeguarding principle is: if a child is at risk of harm, in immediate danger, or has been harmed, a referral must be made to the local authority's children's social care.**

### 8.2. Legal Basis for Sharing Information

- Under the Data Protection Act 2018 (DPA 2018), the processing condition of "*safeguarding of children and individuals at risk*" allows practitioners to share information without consent where:
  - It is not possible to gain consent,
  - It cannot reasonably be expected that consent is sought, or
  - Seeking consent would place a child at risk.
- The UK GDPR also provides lawful bases for sharing personal and special category personal data. Even if a victim does not consent, staff may lawfully share information if another legal basis applies.

### 8.3. Consent, Confidentiality and Victim Wishes

- Staff must never promise confidentiality to a child making a disclosure of abuse. This may not be in the child's best interests.
- If a victim of sexual violence or harassment requests that information is not shared:
  - The DSL must weigh the victim's wishes against their duty to protect the victim and other children.
  - Parents or carers will normally be informed, unless this would place the victim at greater risk.
  - All decisions must prioritise safeguarding and welfare, in line with statutory guidance.

### 8.4. Referrals to Statutory Agencies

- Criminal offences such as rape, assault by penetration and sexual assault are crimes. Any such reports must be referred to the police.
- The age of criminal responsibility is 10; however, referrals to the police remain appropriate even if the alleged perpetrator is younger.

- The School will co-operate with police and children's social care in all child protection investigations, in line with section 47 of the Children Act 1989 and Working Together to Safeguard Children (2023).

#### 8.5. Anonymity and Confidential Handling of Reports

- All staff must take all reasonable steps to protect the anonymity of children involved in reports of sexual violence or harassment.
- Staff should:
  - Share details only with those who need to know.
  - Put in place appropriate support for all children involved.
  - Be alert to the risks of social media in spreading rumours or identifying victims.
- Staff must understand anonymity, witness support, and the criminal process, particularly where cases progress through the justice system.

#### 8.6. Guidance for Staff on Information Sharing

- The Government's Information Sharing Advice for Safeguarding Practitioners (2018) sets out seven "golden rules" for safe and appropriate information sharing.
- Where in doubt, staff must always seek advice from the DSL (or deputy) before sharing information.

#### 8.7. Data Protection Obligations

- The School will keep all child protection records confidential and secure, and only disclose them:
  - When required by law, or
  - Where necessary to safeguard and promote the welfare of children.
- GDPR compliance cannot stand in the way of safeguarding children.
- Governing bodies and proprietors must ensure that under the DPA 2018 and UK GDPR the School:
  - Processes personal data fairly, lawfully, and transparently.
  - Keeps personal information safe and secure.
- Key references:
  - ICO guidance for organisations (obligations and compliance).
  - DfE Data Protection in Schools guidance (data handling, retention, preventing breaches).

#### 8.8. Additional Safeguarding Requirements under KCSIE 2025

- **Attendance:** The School recognises Working Together to Improve School Attendance (2024) is statutory. Absence may indicate safeguarding concerns and must be addressed in partnership with children's services.
- **Online Safety:** Staff must recognise risks from online harms, including exposure to misinformation, disinformation and conspiracy theories, alongside exploitation, grooming and cyberbullying.
- **Alternative Provision:** Where pupils attend alternative provision, the School must obtain appropriate safeguarding assurances, know the exact location of provision (including satellite/temporary sites), and confirm safeguarding measures are in place.

#### 8.9. Allegations Against Staff

- Where allegations are made against staff, the School will consult the Local Authority Designated Officer (LADO) and, where appropriate, the police and social services, to determine what information should be disclosed, to whom, and when.
- Residential staff under investigation may be supported to move off-site during the investigation to ensure safeguarding and fairness.

Confidentiality is also addressed in this policy concerning record-keeping in section 17, and allegations of abuse against staff in appendix 3

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## 9. Recognising abuse and taking action

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

- Has a disability
- Has special educational needs (whether or not they have a statutory education, health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse, such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

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

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

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

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

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

#### 1. Immediate Action

- Make a referral without delay to Worcestershire Children First – Family Front Door and/or the police (999 in an emergency).
- Anyone can make a referral. If you make a referral directly, you must inform the DSL (or deputy) as soon as possible.

#### 2. Local Referral Procedures (Worcestershire Children First)

- Family Front Door (Children's Social Care)
  - 01905 822666 (office hours)
  - 01905 768020 (out of hours – Emergency Duty Team)
  - Online referral form: Worcestershire Children First – Family Front Door

### 3. West Mercia Police

- 999 (if the child is in immediate danger)
- 101 (non-emergency safeguarding concern).
- Professionals should use the Levels of Need Guidance and the WSCP procedures to support decision making about thresholds and referrals.

### 4. School Procedure

- All referrals must be recorded on the school safeguarding system; MyConcern, with a clear note of the time, date, and person spoken to at the Family Front Door (or police).
- The DSL will follow up any referral within 24 hours if requested by Children's Social Care.
- The DSL is responsible for ensuring the school works in partnership with Children's Social Care, police, health, and other agencies, in line with Worcestershire Safeguarding Children Partnership arrangements.

### 5. External Guidance

- For concerns outside Worcestershire, guidance on how to report child abuse to the relevant local authority can be found here: [Report child abuse to your local council](#)

## 9.2 If a child discloses to you

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

- Listen to and believe them. Allow them time to talk freely, and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next, and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and **do not** put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to the local authority children's social care and/or the police directly (see 9.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

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

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

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

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

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

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

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

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures, as outlined below:

#### Local Pathway (Worcestershire)

In Worcestershire, staff must follow the Worcestershire Safeguarding Children Partnership (WSCP) FGM Pathway:

- 1. Immediate Risk or Concern that FGM may be carried out**
  - Make a referral to Children's Social Care via the Family Front Door:
    - 01905 822 666 (office hours)
    - 01905 768 020 (out of hours – Emergency Duty Team)
  - Clearly state the concern relates to possible FGM risk.
  - Children's Social Care will assess risk and take appropriate protective action, including consideration of an FGM Protection Order.
- 2. FGM has Already Taken Place (Disclosure or Physical Signs)**
  - Mandatory report to the police via 101 (or 999 if immediate danger).
  - Inform the DSL immediately.
  - Make a referral to Children's Social Care (Family Front Door) in parallel.
  - Record all actions taken on the child's safeguarding record.
- 3. Health Needs**
  - If the child requires medical attention, refer to appropriate health services (GP, paediatrician, or safeguarding nurse).
  - Professionals should also be aware of referral pathways to specialist FGM services.
- 4. Multi-Agency Working**
  - Concerns will be managed through a strategy discussion involving police, children's social care, health, and education.
  - The School will provide relevant information and continue to support the child.
- 5. Record-Keeping and Confidentiality**
  - All concerns, discussions, and actions taken must be recorded accurately and stored securely in safeguarding records.
  - Information should only be shared with relevant agencies, in line with the Data Protection Act 2018, UK GDPR, and safeguarding duties.

#### Training and Awareness

- All staff must receive training to:
  - Recognise signs of risk and indicators that FGM may already have occurred.
  - Understand the mandatory reporting duty.
  - Know how to follow the Worcestershire FGM Pathway.

The DSL will ensure the policy and pathway are regularly reviewed and staff are confident in their responsibilities.

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

Figure 1 below, before section 9.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

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

#### **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 the local authority's children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

#### **Early Help Assessment Procedure (Worcestershire)**

Early Help means providing support as soon as a concern emerges, to prevent issues from escalating. In Worcestershire, the Early Help process is as follows:

##### **1. Identification**

- Any member of staff may identify a child who would benefit from Early Help.
- Staff must inform the DSL, who will decide whether the concern can be met through the school's own Early Help offer, or whether to initiate a formal Early Help Assessment.

##### **2. Consent & Engagement**

- The DSL (or other professional) will meet with the child and family to explain the process and obtain consent for an assessment and for sharing information.
- Where appropriate, a Team Around the Family (TAF) meeting may be arranged to include other agencies.

##### **3. Assessment**

- The Worcestershire Early Help Assessment form will be completed with the child and family, identifying strengths, needs and risks.
- A support plan will be developed with SMART actions, timescales, and responsibilities.

##### **4. Lead Professional**

- If more than one agency is involved, a Lead Professional will be appointed to co-ordinate the plan and act as a single point of contact for the family.
- The DSL may act as Lead Professional, or another agency may take this role.

##### **5. Delivery of Support**

- Agencies and practitioners carry out their agreed actions.
- The school should remain actively involved and continue to support the child.

## 6. Review

- The plan will be reviewed every 6–12 weeks (or earlier if required), led by the Lead Professional.
- The review will assess progress and whether the child's needs are being met.
- If outcomes are not improving or risks are escalating, the plan will be revised.

## 7. Escalation

- If at any point the child may be at risk of significant harm, the DSL will make a referral to Children's Social Care via the Family Front Door:
  - 01905 822666 (office hours)
  - 01905 768020 (out of hours – Emergency Duty Team).

## 8. Closure

- When needs have been met, or only universal services are required, the Early Help Plan may be closed.
- A closing summary will be submitted via the Early Help Portal, and records will be retained securely by the school.

### Referral

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

If you make a referral directly (see section 9.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

### Escalation of Professional Concerns (Worcestershire)

If the DSL or another practitioner is unhappy with the outcome of a referral, assessment, or safeguarding decision, the school will follow Worcestershire Safeguarding Children Partnership (WSCP) – [WSCP Escalation Policy V4 \(Feb 2024\)](#)

### Process:

#### 1. Stage 1 – Informal Resolution (within 1 working day)

- Raise the concern directly with the professional who made the decision and/or their line manager.
- Aim to resolve promptly, within one working day, and sooner if there is immediate risk of harm.
- Most disagreements should be resolved quickly at this stage.

#### 2. Stage 2 – Manager to Manager (within 2 working days)

- If unresolved, escalate to the relevant team manager or senior manager in each agency.
- Both managers should discuss the concern and aim to resolve it within two working days.
- The discussion and any agreed actions must be documented.

#### 3. Stage 3 – Senior Leadership Escalation (within 3 working days)

- If concerns remain, escalate to senior safeguarding leads or heads of service across the agencies.
- A multi-agency meeting may be convened to review the case and agree next steps.

- Resolution should be reached within three working days of the concern being raised.

#### 4. Stage 4 – Worcestershire Safeguarding Children Partnership (WSCP) (immediate if unresolved and risk remains)

- Where disagreement continues and there is significant risk to the child, escalate to the WSCP Business Manager for formal resolution.
- This escalation should be immediate, and not delayed where the child may be at risk of significant harm.

#### Timescales:

- Each stage should be completed in no more than 1–3 working days, depending on the level of risk.
- Escalation must never delay action to protect a child, if at any point there is an imminent risk of harm, safeguarding action must be taken immediately.

#### Recording:

- All stages must be recorded in writing on the child's safeguarding record, including: the concern, discussions held, decisions reached, and actions agreed.

#### 9.5 If you have concerns about extremism

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

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

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

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism concerning a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is **not** for use in emergencies.

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

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

#### 9.6 If you have a concern about mental health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. However, 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. Bredon School has employed a mental health practitioner who offers a range of advice and support to help them identify children in need of extra mental health support, this includes working with external agencies.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 9.4. All concerns must be reported to the DSL or DDSL and logged on to MyConcern.

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

### Mental Health & Safeguarding

In line with Keeping Children Safe in Education (2025), our school has processes to identify, escalate, refer, and ensure accountability when concerns about pupils' mental health arise:

All staff are trained and alert to early signs of mental health difficulties (changes in behaviour, mood, attendance, academic performance etc.), and understand that these may sometimes indicate abuse, neglect or exploitation.

Staff must record and share concerns immediately with the DSL or Mental Health Lead. If a concern also involves safeguarding, child protection procedures must be followed without delay.

The school has clear escalation routes: where internal pastoral support or interventions are not sufficient, referrals are made to external services (e.g. CAMHS, GP, or other health services), with parental/carer involvement when appropriate.

The DSL and senior leadership oversee that all mental health concerns, referrals and interventions are logged, monitored, reviewed, and that outcomes are evaluated. Staff receive induction and ongoing training in recognising mental health issues and understanding their role in escalation.

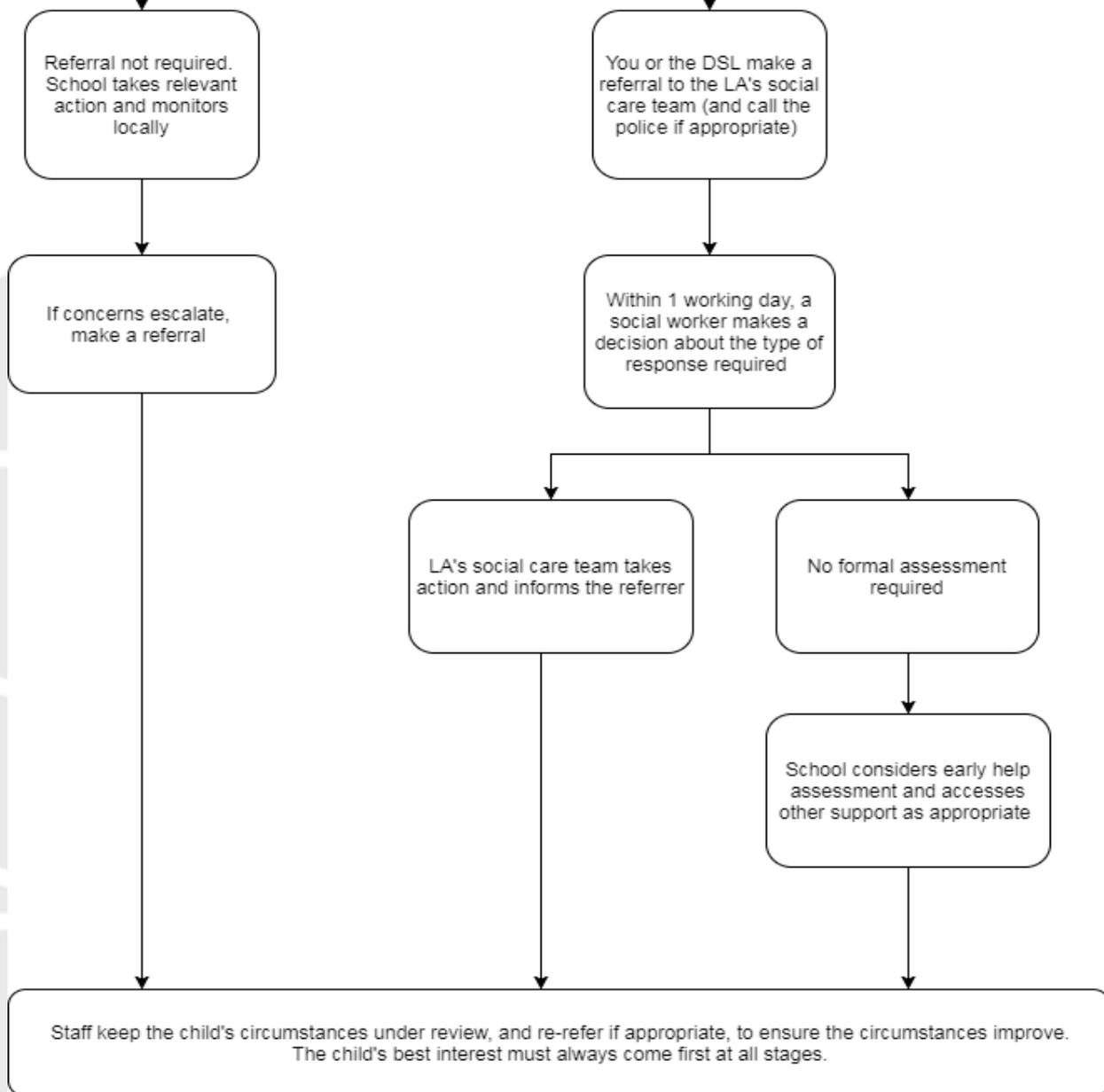
For full detail, see our Positive Mental Health & Wellbeing Policy; this safeguard approach links with KCSIE 2025 expectations that *“all staff should be prepared to identify children who may benefit from early help”* and that mental health problems may be a sign of underlying safeguarding concerns.

You have concerns about a child

Speak to the DSL

**Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 9.4 for what to do.)



### 9.7 Concerns about the Headmaster, Chair of Governors, Governor, a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in Appendix 3, if appropriate.

If you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

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

#### Allegations against the Headmaster or DSL

Where a low-level concern relates to the headteacher, it should be reported to the chair of governors, Koen Claeys - [k.claeys@cavendisheducation.com](mailto:k.claeys@cavendisheducation.com). If the concern is about the DSL, this should be reported directly to the Headmaster and not recorded on confide. Any such allegation will be discussed with the LADO before further action is taken.

#### Allegations against the Chairman or Governors

Where an allegation or concern is made about a Governor (including the Chair of Governors), the person receiving the allegation should immediately inform the Headmaster without first notifying the person subject of the allegation or concern. Any such allegation will be discussed with the LADO before action is taken.

### 9.8 Allegations of abuse made against other pupils

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

All child-on-child abuse is unacceptable and will be taken seriously.

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

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- 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 sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

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

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

- You must record the allegation and tell the DSL, **but do not** investigate it
- The DSL will contact the local authority’s 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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

### Allegations against pupils

The school recognises that children may be harmed by other children and that child-on-child abuse can take many forms, including bullying, physical abuse, sexual violence and harassment, upskirting, initiation/hazing, or online abuse. In line with Keeping Children Safe in Education (2025), paragraphs 30–33, the following procedures apply:

### **Recording and Reporting**

- All allegations, suspicions or disclosures of child-on-child abuse must be reported immediately to the DSL (or deputy) and recorded in detail on the school's safeguarding system.
- Records must capture the nature of the allegation, who was involved, when and where the incident took place, and any immediate action taken.
- Records will be kept confidential and only shared with staff/agencies who need to know to protect the child(ren).

### **Investigating Allegations**

- The DSL will take advice from the Worcestershire Safeguarding Children Partnership (WSCP) and other statutory partners (Children's Social Care, Police) to determine the appropriate course of action.
- A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect significant harm.
- In serious cases (e.g. sexual violence, sexual harassment), the DSL will make an immediate referral to Children's Social Care and/or the Police, and follow the school's Child-on-Child Abuse Policy.
- Where abuse may constitute a safeguarding issue, the matter will be managed under these safeguarding procedures rather than solely the Behaviour Policy.

### **Supporting Victims, Perpetrators and Other Children**

- The school will ensure that both the victim(s) and the alleged perpetrator(s) are safeguarded and supported throughout any investigation. This may include pastoral care, counselling, adjustments to timetables, supervision arrangements, or temporary separation in school.
- Where necessary, and in line with legal guidance, a student may be excluded during the investigation to ensure the safety and welfare of others (see Behaviour and Exclusions Policies).
- Parents/carers (or guardians for pupils with parents abroad) will be informed as soon as possible, unless doing so would place a child at greater risk of harm.
- If police interviews are required, the school will ensure that an appropriate adult is present to support the student(s).
- The school will consider the wider impact on other children and provide support for any pupils indirectly affected.

### **Confidentiality and Accountability**

- Confidentiality will be maintained as far as possible, with information shared only on a "need to know" basis and in accordance with the Data Protection Act 2018 and UK GDPR.
- All actions, referrals, and outcomes will be logged by the DSL and regularly reviewed by the Senior Leadership Team and governing body.

- The school will co-operate fully with statutory agencies and follow WSCP guidance to ensure allegations are handled lawfully, fairly, and with children's welfare as the priority.

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence concerning boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems (as described in section 9.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

- Some circumstances make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

#### Kinship allegations involving the Headmaster, DSL /DDSL children

Bredon School acknowledges the presence of pupils who are related to either the Headmaster or the DSL and DDSL. In order to ensure a secure environment where all staff members can confidently report safeguarding concerns without bias, the following procedure has been established:

- Headmaster's Child / Children Safeguarding Concerns: If a safeguarding concern arises in relation to the child of the Headmaster, staff members should promptly and verbally report the concern to the DSL in the initial stage.
- DSL / DDSL's Child / Children Safeguarding Concerns: If a safeguarding concern arises regarding the child or children of the DSL / DDSL, staff members should immediately and verbally communicate concern to the Headmaster as the first step.

#### 9.9 Sharing of nudes and semi-nudes ('sexting')

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share incident information with relevant staff, pupils involved, and their parents/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 the 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) 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. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 4 for more information on assessing adult-involved incidents

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

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

#### Further review by the DSL

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

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

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

#### Informing parents/carers

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

#### Referring to the police

Where referral to the police is required, this will be through the school's existing arrangements with West Mercia Police:

- Non-emergency concerns – dial 101.
- Immediate danger or ongoing risk – dial 999

#### Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

#### Curriculum coverage

At our school, pupils learn about the risks of sharing nudes and semi-nudes through a joined-up programme of RSHE lessons, computing, assemblies and the tutor programme. This ensures regular, age appropriate opportunities to revisit the topic and build knowledge, skills and confidence.

#### **Teaching covers:**

- What sharing nudes and semi-nudes is and how children are most likely to encounter it (e.g. social media, messaging apps, peer requests).
- The consequences of creating, requesting, forwarding or possessing such images, including the emotional impact, risks to reputation, and potential harm to relationships.
- When it may be abusive or classed as online sexual harassment, and the relevant legal framework, including the law on images of under-18s.
- Practical strategies to resist pressure, manage requests, and respond safely if such images are received.

#### **How we deliver this:**

- Assemblies provide whole-school reinforcement and raise awareness in a safeguarding-first way.
- Tutor sessions give pupils a safe space to reflect, discuss and practise strategies to manage peer pressure.
- RSHE and computing lessons provide structured teaching about the legal, social and emotional dimensions of sexting, grounded in national statutory guidance.

#### **Safeguarding focus:**

- All teaching puts pupils' safety and wellbeing first, avoids scare tactics, and challenges victim-blaming attitudes.
- Pupils are made aware of our school policy so they know the steps staff will take to protect them if an incident occurs.
- We approach the topic from the perspective of the child, emphasising empathy, respect, and seeking help from trusted adults.

### **Cross-reference**

Further detail about how these themes are sequenced and delivered can be found in the school's Relationships and Sex education Policy, which should be read alongside this Safeguarding and Child Protection Policy.

### **9.10 Reporting systems for our pupils**

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

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, we have a range of reporting systems in place that are well-promoted, easily understood, and accessible to all pupils:

- **Student Voice:** Weekly student voice meetings provide an open forum for pupils to raise issues, supported by staff who are trained to listen and act appropriately.
- **Talk to Me Boxes:** Pupils can post written concerns or requests confidentially. These are checked regularly by the pastoral team.
- **Direct Contact:** Pupils have access to school email addresses so they can contact trusted staff directly if they feel more comfortable writing than speaking.
- **Pastoral Team:** Pupils can approach the pastoral team at any time during the school day for support or to share concerns.

### **Making Pupils Aware of the Systems**

- Reporting routes are explained through assemblies, tutor time, and the RSHE curriculum, so pupils know how to access them and what to expect.
- Pupils are reminded regularly that they can speak to any trusted adult in school, who will ensure their concern is passed on to the DSL.

### **Creating a Safe Reporting Culture**

- Pupils are reassured that any concern they raise will be taken seriously, handled sensitively, and recorded securely.
- They are made aware that staff cannot promise confidentiality if a concern involves safeguarding, but that their views will always be considered when decisions are made.
- Feedback is given to pupils who raise concerns so they know they have been heard and action is being taken.

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## **10. Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material. Technology is a significant component in many safeguarding and wellbeing issues, and our school is committed to a whole-school approach to online safety.

### **The 4 Key Categories of Online Risk**

Our approach is structured around the four categories of risk set out in Keeping Children Safe in Education 2025:

- **Content:** Being exposed to illegal, inappropriate or harmful material (e.g. pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation and conspiracy theories).
- **Contact:** Being subjected to harmful online interaction with other users, including peer pressure, exploitation, grooming and coercion.

- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm (e.g. creating, sending or receiving explicit images, online bullying, or abusive language).
- **Commerce:** Risks such as online gambling, scams, phishing and inappropriate advertising.

### How We Address These Risks

To keep pupils safe, our school will:

- **Filtering and monitoring:** Maintain robust filtering and monitoring systems (Smoothwall) on all school devices and networks, in line with DfE Filtering and Monitoring Standards. Alerts are sent directly to DSLs/DDSLs if breaches are attempted.
- **Device management:** Operate secure BYOD logins and ensure all personal devices meet security standards. Pupils' Chromebooks are locked to the school's managed Google environment and cannot connect to external networks.
- **Curriculum education:** Deliver a comprehensive online safety programme through PSHCE, computing, assemblies, tutor programmes, and the Digital Leaders initiative. Content includes: safe social media use, privacy, cyberbullying, resisting pressure, sexting, grooming, misinformation, extremism and online radicalisation. National opportunities (e.g. Safer Internet Day, Anti-Bullying Week) are used to reinforce key messages.
- **Age-specific teaching:** Provide "Life Lessons" modules in Years 8, 10 and 12, covering wellbeing, critical thinking, social media literacy, online grooming and digital resilience.
- **Staff training:** Train all staff on online safety, data protection, cyberbullying, online sexual harassment and Prevent-related online risks. This is part of induction and refreshed annually.
- **Parent/carer engagement:** Provide regular updates and guidance to parents/carers through bulletins, seminars, our website and national campaigns, including how to raise concerns.
- **Acceptable Use:** Require pupils, parents, carers, staff, governors and volunteers to sign Acceptable Use Agreements covering ICT systems, internet use and mobile devices.
- **Mobile phone use:** Apply clear rules. Pupils may only use phones when permitted for learning; otherwise, devices must be stored securely. Staff may use personal devices in line with the Acceptable Use Policy and must never take images or recordings of pupils on personal devices.
- **Searching/screening:** Make staff, pupils and parents aware that staff have powers to search, screen and confiscate devices, in line with DfE guidance.
- **Technical security:** Enforce robust technical security, including strong password protocols, endpoint protection, encrypted storage and secure backups.
- **Prevent Duty:** Use filtering to block extremist and radicalising material, and educate pupils to critically assess and report harmful online content.
- **Incident management:** Record, investigate and respond to all online safety incidents in line with safeguarding and behaviour policies. Illegal activity will be escalated immediately to the DSL and, where necessary, to the police or external agencies.

### Monitoring and Review

- Online safety arrangements are reviewed annually by the DSL/Online Safety Lead, IT provider, SLT and governors.
- Logs of incidents, monitoring reports and feedback from staff, pupils and parents inform improvements.

### Cross-reference

Full details are set out in the school's Online Safety Policy (Feb 2025), available on our website.

#### 10.1 Artificial intelligence (AI)

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

Bredon School recognises that AI has many potential benefits, including enhancing teaching and learning and supporting safeguarding. However, AI may also facilitate abuse (e.g. bullying or grooming) and/or expose pupils to harmful content. For example, 'deepfakes' can be used to create highly realistic images, audio or video hoaxes.

In line with Keeping Children Safe in Education 2025 and the school's AI Policy (2025), we will:

- **Risk assessments:** Require risk assessments to be completed before introducing any new AI tool for pupil or staff use.
- **Filtering and monitoring:** Apply our school's filtering and monitoring standards (Smoothwall) to AI use, including generative AI, in line with DfE requirements.
- **Safeguarding concerns:** Treat any incident involving harmful or inappropriate AI-generated material (e.g. indecent images, sexualised deepfakes, extremist material, misinformation or grooming attempts) as a safeguarding concern, reporting to the DSL and escalating to the police or Children's Social Care if necessary.
- **Staff awareness and training:** Ensure staff are trained to understand both the opportunities and the risks of AI, including disinformation, exploitation, bias and inappropriate content generation.
- **Curriculum education:** Provide pupils with age-appropriate digital literacy education about AI, including its role in misinformation, identity, ethics, and safe/responsible use.
- **Reporting systems:** Ensure staff and pupils know how to report concerns about AI-generated content quickly and safely, following safeguarding procedures.
- **Review:** Review our approach to AI annually alongside the Online Safety Policy and safeguarding risk assessments, reflecting new risks and updated DfE/KCSIE guidance.

### Cross-reference

For detailed expectations, acceptable use, and reporting procedures, see the school's AI Policy, which should be read alongside this Child Protection and Safeguarding Policy.

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## 11. Notifying parents or carers

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

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority's 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)

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## 12. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEND), health conditions or mental health difficulties can face additional safeguarding challenges. Children with disabilities are statistically more likely to be abused than their peers. Barriers to recognising abuse, exploitation or neglect can include:

- Assuming that behaviours, mood or injuries are linked to a child's condition without further exploration.
- Increased vulnerability to isolation or prejudice-based bullying.
- Pupils with SEND being disproportionately impacted by harmful behaviour (e.g. bullying, harassment) without outward signs.

- Communication barriers that make disclosure or reporting difficult.
- Cognitive differences; e.g. struggling to distinguish fact from fiction online, or not understanding the consequences of their actions.

### Pastoral Intervention and Support

At Bredon School, pupils benefit from a range of pastoral interventions designed to safeguard and promote wellbeing. These include:

- Access to the Health and Wellbeing Centre (HWC) for medical, counselling, early help assessments, and therapeutic support.
- Structured Mental Health and Wellbeing Pathway, offering assessment, referral, targeted intervention and ongoing review.
- Heads of House, who work 1:1 with pupils to provide tailored support such as anger management, ASD awareness, restorative conversations, and conduct work when pupils' behaviour or views are not aligned with school expectations or societal norms.
- A peer-led Digital Leaders programme, which empowers pupils to support each other in safe technology use, online behaviour, and positive digital citizenship.
- Pastoral team and house staff providing mentoring, daily check-ins and enhanced monitoring for vulnerable pupils.
- SEND specific support led by the SENCO, SALT and DSL / DDSL, including adapted RSHE teaching, visual supports, wellbeing passports, key adult mentoring, and communication aids (e.g. social stories, visual timetables, assistive technology).
- Collaboration with external agencies (e.g. CAMHS, GPs, educational psychologists, social care) where specialist input is required.

### Safeguarding Oversight

- Any safeguarding concern involving a pupil with SEND, health or mental health needs will require close liaison between the DSL (or deputy) and the SENCO, alongside the Health and Wellbeing Centre.
- The DSL will ensure the pupil's voice is considered, adapting communication methods as necessary.
- We are alert to the additional vulnerabilities pupils may face in our residential setting, and ensure house staff receive training to recognise and respond to safeguarding risks for pupils with SEND.

### **Compliance Note:**

This approach reflects the requirements of Keeping Children Safe in Education (2025), ensuring our safeguarding practice actively recognises and reduces additional barriers for pupils with SEND and health needs.

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## **13. Pupils with a social worker**

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

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

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## **14. Looked-after and previously looked-after children**

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

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

We have appointed an appropriately trained teacher, Mrs Jodie Grant, Assistant Head of Learning and Development and SENCO to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

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## 15. Pupils who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2025 on gender questioning children remains under review, pending the publication of revised guidance.

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

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

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

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

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities, such as the risk of bullying.

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

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## 16. Complaints and concerns about school safeguarding policies

### 16.1 Complaints against staff

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

### 16.2 Other complaints

Safeguarding related complaints may arise in relation to staff, pupils, volunteers, governors, the premises, or third party use of school facilities. The school will take all such complaints seriously and respond in line with statutory guidance and Worcestershire Safeguarding Children Partnership (WSCP) procedures.

- **Priority of safeguarding:** Where a safeguarding complaint overlaps with the school's formal Complaints Policy, safeguarding considerations will always take precedence. The welfare of the child is paramount.
- **Reporting routes:** Safeguarding complaints can be raised with the DSL (or deputy), the Headmaster, or the Safeguarding Governor. Pupils, parents and members of the school community may also raise safeguarding complaints directly with Children's Social Care (Family Front Door), the police, or the NSPCC.
- **Complaints relating to staff:** Allegations against staff, volunteers or governors will be managed in line with KCSIE 2025 and WSCP procedures, including referral to the Local Authority Designated Officer (LADO) within one working day. Low-level concerns will be recorded and managed in accordance with the school's Low-Level Concerns procedures.
- **Complaints relating to pupils:** Allegations or complaints involving pupils (including child-on-child abuse, bullying, harassment or online safety concerns) will be managed under safeguarding procedures and, where appropriate, referred to Children's Social Care and/or the police.
- **Complaints relating to premises or third parties:** Where a safeguarding allegation relates to the premises or third party use of school facilities, the same safeguarding standards apply. The DSL and Headmaster will liaise with external agencies, including the LADO, to ensure appropriate action.
- **Confidentiality and GDPR:** All safeguarding complaints will be recorded and stored securely, in line with the Data Protection Act 2018 and UK GDPR. Information will be shared only on a "need to know" basis, and never withheld where there is a risk to a child's safety.
- **Boarding setting:** Given the nature of our school, particular care will be taken to ensure that safeguarding complaints involving boarding staff, house staff, or residential facilities are escalated swiftly to the DSL and Headmaster, with liaison to the LADO and/or Children's Social Care where necessary.

### 16.3 Whistleblowing

The school is committed to the highest standards of openness, integrity and accountability. All staff should feel able to raise concerns about poor or unsafe practice, malpractice, or potential failures in the school's safeguarding arrangements.

- **Scope of concerns:** Whistleblowing procedures cover safeguarding related malpractice or wrongdoing, including:
  - Concerns about unsafe or poor safeguarding practice.
  - Failures in the school's safeguarding regime or policies.
  - The behaviour or conduct of colleagues, volunteers, governors, or contractors that may put pupils at risk.
- **Reporting options:**
  - Staff should report concerns to the Headmaster.
  - If the concern relates to the Headmaster, it should be reported to the Chair of Governors or the nominated Safeguarding Governor.
  - Staff may also raise concerns with any Designated Safeguarding Lead (DSL).
  - Where staff feel unable to raise concerns internally, they may contact the Local Authority Designated Officer (LADO), Worcestershire County Council (Family Front Door), the police, or the NSPCC Whistleblowing Advice Line (0800 028 0285).
- **School's response:**
  - Concerns will be taken seriously, investigated promptly and fairly, and appropriate action taken.
  - Feedback will be given to the whistleblower where possible, while maintaining necessary confidentiality.
- **Protection for whistleblowers:**
  - No member of staff will face disciplinary action, detriment, or dismissal for raising safeguarding concerns in good faith.
  - Staff are protected under the Public Interest Disclosure Act 1998 (PIDA) when making a qualifying disclosure.
  - Victimisation of whistleblowers will not be tolerated.

For full details, staff should refer to the school's Whistleblowing Policy.

## 17. Record-keeping

The Designated Safeguarding Lead (DSL) is responsible for ensuring that safeguarding and child protection records are maintained in line with statutory guidance and best practice.

We will hold all safeguarding records in line with the school's records retention schedule.

All safeguarding concerns, discussions, decisions made, and the rationale for those decisions will be recorded in writing. This includes instances where referrals were, or were not, made to another agency such as children's social care or the Prevent programme. Staff who are unsure whether something should be recorded must discuss this with the DSL.

### Each safeguarding record will include:

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

### Storage and confidentiality:

- The school primarily uses MyConcern as its secure electronic safeguarding system. Records are uploaded to the pupil's profile, password-protected, and accessible only to the DSL and deputy DSLs.
- Where paper records are received (e.g. when a new pupil joins the school), they are scanned in full and uploaded to MyConcern. Once uploaded, paper copies are disposed of securely using confidential waste.
- Historical safeguarding files that have not yet been digitised are stored securely in a locked cabinet accessible only to the DSL and deputy DSLs. These are gradually being transferred to the electronic system or retained securely until the end of their retention period.
- Non-confidential records (such as staff training logs) will be readily accessible. Confidential safeguarding records will be held securely and made available only to those with a professional need to know.

### Retention:

- Safeguarding records relating to individual children will normally be retained until the child's 25th birthday, in accordance with IRMS guidance and the school's retention schedule.

### Transfer of records:

- When a pupil with safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded securely and separately from the main pupil file.
- To ensure support is in place for the child from the start, this transfer will take place within:
  - 5 school days for an in-year transfer; or
  - The first 5 school days of the start of a new term.
- Where concerns are significant or complex, and/or social services are involved, the DSL will also speak directly with the DSL of the receiving school to enable appropriate preparations to be made.

### Information sharing:

- Safeguarding records and information will be processed in line with the Data Protection Act 2018 and UK GDPR. Safeguarding provides a lawful basis for processing and sharing information, and confidentiality will always be respected. Information will only be shared where necessary to protect a child.
- The school will share safeguarding information with external agencies (including Worcestershire Children First, the police, and health services) in line with Working Together to Safeguard Children 2023 and local safeguarding procedures.

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## 18. Training

### 18.1 All staff

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

This training will be regularly updated and will:

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

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

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

All staff will complete the Safeguarding INSET training, complete a Safeguarding questionnaire and refresh their Educare Safeguarding Young People online training.

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

Volunteers will receive appropriate training, if applicable.

### 18.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

### 18.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

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

### 18.4 Recruitment – interview panels

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

See Appendix 2 of this policy for more information about our safer recruitment procedures.

## 19. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- AI
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistleblowing

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### 00. Contact Information

For any questions or concerns regarding this policy, please contact Miss Charmain Eaton, Deputy Head (Pastoral and Safeguarding), DSL.

### 00. Approval & Policy Review

This Policy has been reviewed and approved by:

<b>Policy Approver(s)</b>	The Board of Directors
<b>Storage Location</b>	Online, Policies Drive
<b>Effective Date</b>	1st September 2025
<b>Next Review Date</b>	31st August 2026

### 00. Revision History

Version	Change	Author	Date of Change
v1	Original document	Cavendish Central Team	01/09/2025
v2	Original document	Miss Charmain Eaton	23/09/2025

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

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

## Appendix 2: Safer recruitment and DBS checks – policy and procedures

### Safer recruitment policy

#### Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

#### Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

#### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and the reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask the shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at the interview stage. The information we may ask for includes:
  - o If they have a criminal history
  - o Whether they are included on the barred list
  - o Whether they are prohibited from teaching
  - o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - o Any relevant overseas information
  - o If they are known to the policy and the children's local authority social care, and
  - o If they have been disqualified from providing childcare
- Sign a declaration confirming that the information they have provided is true

We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

#### Seeking references and checking employment history

The school seeks to obtain references before interview wherever possible. In some cases, candidates may request that referees are not contacted prior to interview. The school will respect this, but any offer of employment will always be conditional on the receipt of two satisfactory references.

Where references are not obtained before interview, they will be requested immediately after.

Any concerns arising from references will be explored with the referee and discussed with the candidate, either at interview (if available) or before any appointment is confirmed.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer are completed by a senior person. Where the referee is school-based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children, if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

#### Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

#### Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

#### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and the recruitment decision taken
- Obtain a separate barred list check to see if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - o For all staff, including teaching positions, [criminal records checks for overseas applicants](#)
  - o For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any

sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the Secretary of State

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

For staff who are working with children under the age 8, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment in the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, regularly in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

#### Existing staff

In certain circumstances, we will carry out all the relevant checks on existing staff as if the individual were a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult, where:

- We believe the individual has engaged in [relevant conduct](#), or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

#### Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

#### Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For staff who are working with children under the age 8, for self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

#### Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

For staff who are working with children under the age 8, in both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

For staff who are working with children under the age 8:

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

All local governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

The chair of the board will have their DBS check countersigned by the Secretary of State.

All proprietors, Directors, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All local governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

#### Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

#### Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether barred list checks must be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

#### Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken before the visit.

## Appendix 3: allegations of abuse made against staff

### Allegations against staff (including low-level concerns) policy

#### Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of local governors, where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

#### Suspension of the accused until the case is resolved

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

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

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care, where they have been involved.

#### Definitions for outcomes of allegation investigations

- Substantiated: There is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation, and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- False: There is sufficient evidence to disprove the allegation

- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- Unfounded: to reflect cases where no evidence or proper basis supports the allegation being made

### Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree on a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to the local authority's children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Employees who are members of a Trade Union may contact them for advice and support. We also offer the Employee Assistance Programme, details of which have been given to you on appointment, displayed on posters around school or can be obtained from HR.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only concerning their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

#### Additional considerations for supply teachers and all contracted staff

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

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

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

#### Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

#### Specific actions

Action following a criminal investigation or prosecution

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

#### Conclusion of a case where the allegation is substantiated

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

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

#### Individuals returning to work after suspension

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

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

#### Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

#### Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

#### Confidentiality and information sharing

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

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

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

#### Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them in the individual's confidential personnel file for the duration of the case.

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

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

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

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

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

## References

When providing employer references, we will:

- Provide a standard reference, including whether there have been safeguarding concerns or not (as relevant)
- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practices to help prevent similar events in the future.

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

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

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

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

## **Section 2: concerns that do not meet the harm threshold**

This section applies to all concerns (including allegations) about members of staff, supply teachers, volunteers and contractors, which do not meet the harm threshold for referral to the Local Authority Designated Officer (LADO).

### Sources of low-level concerns

- Concerns may arise through, for example:
  - Suspicion.
  - A complaint.
  - A safeguarding concern or allegation raised by another member of staff.
  - A disclosure made by a child, parent or other adult inside or outside the school.
  - Pre-employment vetting checks.

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

### Definition

A 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 serious enough to be considered a referral to the LADO.

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

- Being overly friendly with pupils.
- Having favourites.
- Taking photographs of pupils on a personal device.
- Engaging with a pupil one-to-one in a secluded area or behind a closed door.
- Humiliating pupils.

### Culture of openness

The school is committed to creating and maintaining a culture of openness, trust and transparency to encourage all staff to confidently share low-level concerns so 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, including about themselves (self-referral).
- Addressing unprofessional behaviour and supporting individuals to correct it at an early stage.
- Providing responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

### Reporting low-level concerns

- All staff are expected to report low-level concerns to the Headmaster, or to the Chair of Governors if the concern relates to the Headmaster.
- Concerns can be raised directly or logged confidentially via the school's electronic reporting system (Confide).

### Responding to low-level concerns

- If the concern is raised via a third party, the Headmaster will collect evidence where necessary by speaking directly to the person who raised the concern (unless anonymous), the individual involved, and any witnesses.
- The Headmaster is the ultimate decision-maker in respect of all low-level concerns, though they may consult with the DSL where appropriate.
- The information collected will be used to categorise the behaviour and determine any further action in line with the school's Staff Behaviour Policy/Code of Conduct.
- Actions may include management advice, additional training, informal guidance, or escalation to disciplinary procedures.
- Where patterns of behaviour emerge, concerns may be escalated to meet the harm threshold and referred to the LADO.
- Where a low-level concern relates to a supply teacher or contractor, the school will also notify the individual's employer so that any potential patterns of inappropriate behaviour can be identified.

### Record-keeping

- All low-level concerns will be recorded in writing on Confide. Records will include the details of the concern, the context in which it arose, the action taken, and the rationale for decisions made.
- Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and UK GDPR.
- Records will be reviewed so that potential patterns of behaviour can be identified. Where a pattern emerges, appropriate action will be taken.
- Records will be retained at least until the individual leaves employment at the school, in line with KCSIE and the school's retention schedule.

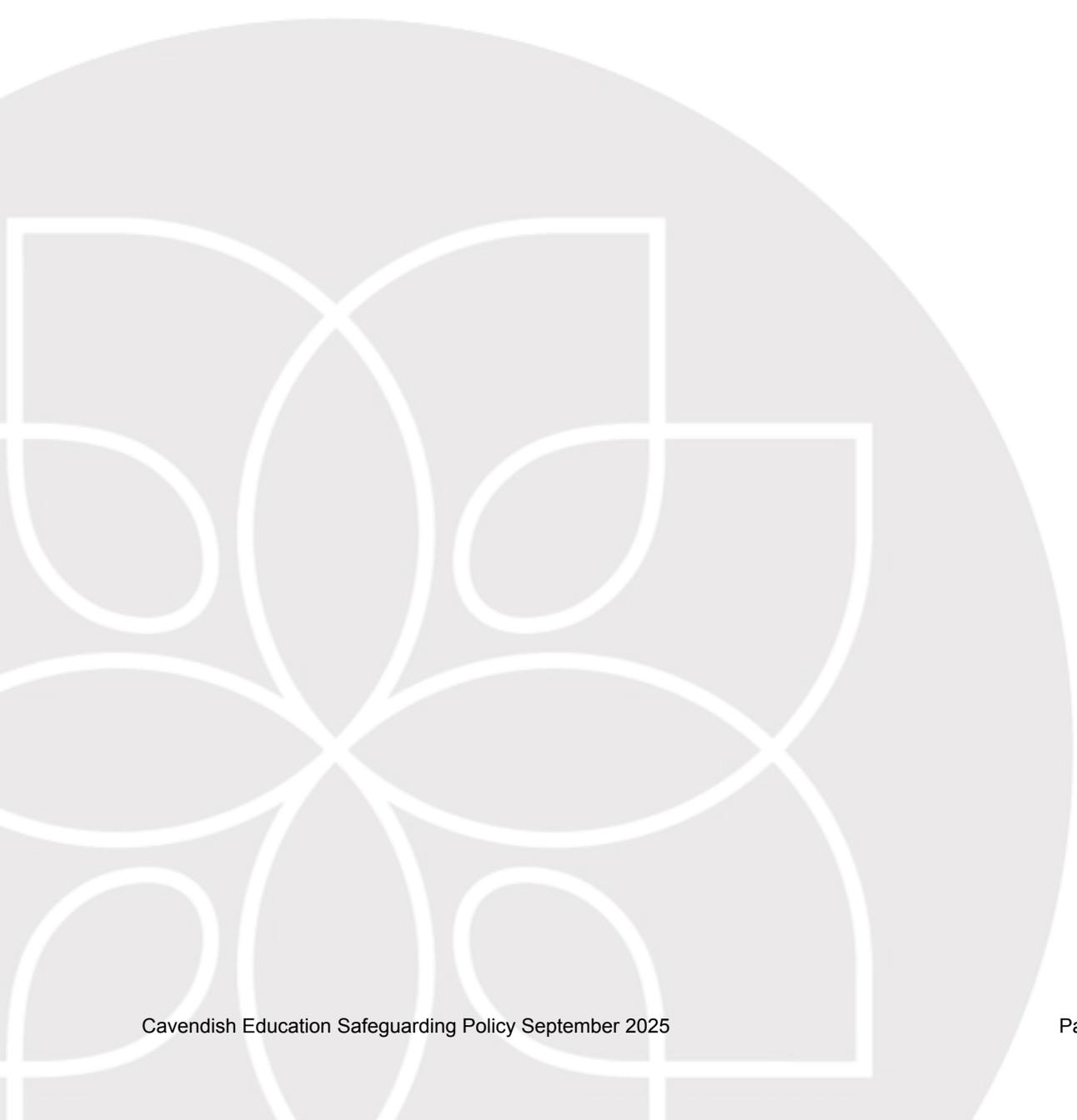
### References

Low-level concerns will not be included in references unless:

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

**Cross-reference**

For full details of definitions, procedures, record-keeping and retention, staff should refer to the school's Low-Level Concerns Policy.



## Appendix 4: Specific Safeguarding Issues

This appendix summarises statutory safeguarding issues as outlined in Keeping Children Safe in Education (KCSIE, Annex B). It provides an overview of the areas staff must be aware of and the potential signs of risk or harm.

The school's specific safeguarding procedures, local referral pathways, and pastoral interventions are detailed in the main body of this policy and related appendices, in line with Worcestershire Safeguarding Children Partnership (WSCP) arrangements.

For clarity:

- **Reporting and escalation** – see Section 9 (Reporting concerns, referrals, and escalation to Children's Social Care and Worcestershire Children First).
- **Allegations against staff/low-level concerns** – see Appendix 3 and the school's Low-Level Concerns Policy.
- **Pupils with SEND or mental health needs** – see Section 8 (Mental Health and Vulnerable Pupils) and the Bredon School Mental Health Pathway.
- **Record-keeping and information sharing** – see Section 10.
- **Online safety and AI** – see Section 8.1 and the school's Online Safety Policy and AI Policy.

Where statutory guidance requires local adaptation (for example, referral procedures, multi-agency working, or school-specific preventative measures), these are set out in the relevant sections of this policy and associated documents.

### Assessing adult-involved nude and semi-nude sharing incidents

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

### Sexually motivated incidents

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

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

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

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

- Contacted by an online account that they do not know, but which appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value, such as money or gaming credits

- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image, or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

### Financially motivated incidents

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

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

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

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

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

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

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

### Children who are absent from education

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

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

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

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

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

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

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

### Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

### Child sexual exploitation

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

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

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

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

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

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

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

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

### Child-on-child abuse

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

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

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

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

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 9.9 set out more details about our school's approach to this type of abuse.

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

### Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to

parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, concerning the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

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

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

### Homelessness

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

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

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

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

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

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

### FGM

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

Section 9.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

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

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

### Forced marriage

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

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

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

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

The DSL will:

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

### Preventing radicalisation

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

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

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

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

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and the local police force. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and home.

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

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

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a pupil, they will follow our procedures set out in section 9.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation is set out in other school policies and procedures.

## Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 11.9 set out more details about our school's approach to this type of abuse.

### Serious violence

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

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

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

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

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

#### Checking the identity and suitability of visitors

All visitors to the school are required to sign in at Reception in Pull Court. Their picture and personal details are taken (car reg etc) and they are issued with a visitor's lanyard (blue) and badge stating their name and containing their picture. They will be escorted whilst on School premises by a member of staff (wearing a maroon lanyard) and required to wear the blue lanyard at all times. DBS checked contractors will have a green lanyard and go through the same procedure.

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors to the school who are regularly visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

#### Boarding House Visitors

All visitors to the house during Reception's working hours are required to sign in at Reception at Pull Court. All visitors outside of these times (parents dropping off out of hours/after Exeat weekends etc) to houses must report to the house staff on duty immediately on arrival, and must expect to be kept under sufficient staff supervision during their visit.

#### Non-collection of children

The school recognises that safeguarding responsibilities continue until all pupils are safely handed over to parents/carers, boarding staff, or placed on appropriate transport at the end of the day.

- **Primary pupils (Years 3–6):** Boarding staff collect and return boarders to their houses. Day pupils are collected by parents/carers or a named responsible adult if travelling on school transport. If a child is not collected at the agreed time:
  - Staff will check for any messages from parents/carers.
  - If no message has been received, staff will attempt to contact parents/carers and, if necessary, emergency contacts.
  - The pupil will remain supervised by staff until collection is arranged.
  - If parents/carers or emergency contacts cannot be reached, the DSL/DDSL will be informed immediately.
  - If a safeguarding concern has been identified, this will be recorded on Myconcern.
- **Secondary pupils and Sixth Form (Years 7–13):** Most pupils travel independently. Where a pupil is due to be collected but no adult arrives, or if a pupil is stranded (e.g. missed bus/taxi):
  - Staff will contact parents/carers to confirm safe arrangements.
  - The pupil will wait in a supervised area until collection or alternative arrangements are made.
  - If safe arrangements cannot be confirmed the DSL/DDSL will be informed immediately.

- Persistent issues will be reviewed with the Head's of House/DSL and followed up with parents/carers.
- **School transport:** If a pupil does not arrive at their designated bus/taxi point:
  - The transport team and supervising staff will immediately check the pupil's last known location (e.g. lesson, boarding house, activity).
  - If the pupil cannot be located within 10 minutes, the DSL/DDSL will be informed immediately.
  - If the pupil remains unaccounted for after 30 minutes, the DSL will escalate in line with the Internal Missing Child Procedure, which may include contacting Worcestershire Children First and/or the police.
  - Parents/carers and/or boarding staff will be contacted to confirm whether the pupil is safe.

### **Cross-reference**

For full details of searches, escalation, and contact with external agencies when a pupil is unaccounted for, staff must follow the Internal Missing Child Procedure for Registration and Lessons.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

- **If a child goes missing in school, staff will:**
  - Immediately search known locations on site and check with peers and supervising staff.
  - Escalate in line with the Internal Missing Child Procedure for Registration and Lessons, which could include recording the incident on MyConcern with times, actions taken, any external referrals (e.g. Police, Children's Social Care), and reasons given by the pupil once found.
- **School transport and non-collection:**
  - For procedures relating to non-collection of pupils or missing pupils at transport collection points, see the section above on School transport and non-collection, which also includes arrangements for boarding pupils.
- **Child Missing in Education (CME):**
  - Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital sign of safeguarding issues including neglect, exploitation, county lines, or forced marriage.
  - The Head's of House, reception and attendance champion monitor attendance daily and escalate concerns promptly.
  - Where a pupil has 10 consecutive school days of unauthorised absence, is removed from the admissions register at a non-standard transition point, or leaves the school with no new provision confirmed, and are not in communication with parents, the school will notify the Children Missing Education (CME) Team at Worcestershire Children First immediately (without delay) using the CME Notification Form.
  - Prior to removal from roll, the school will make reasonable enquiries to establish the child's whereabouts, including contacting parents/carers, checking known addresses and liaising with agencies as appropriate. All attempts will be documented.
  - Worcestershire Children First will investigate CME notifications, track and monitor cases until the child is back in education, and liaise with other local authorities if the child has moved out of area.
  - Where CME concerns also indicate a safeguarding risk (e.g. neglect, exploitation, forced marriage), an immediate referral will be made to Children's Social Care via the Family Front Door (01905 822666), and to the police (999 if in immediate danger, 101 otherwise).
  - All CME notifications and safeguarding referrals will be logged on MyConcern, with actions, decisions and outcomes recorded.

- See also the Attendance Policy, which sets out the school's systems for monitoring attendance, addressing persistent absence, and ensuring compliance with Children Missing Education statutory guidance.

**Key local safeguarding contacts (Worcestershire)**

- Family Front Door (Children's Social Care): 01905 822666 (Mon–Fri, 8:30am–5:00pm)
- Emergency Duty Team (out of hours): 01905 768020
- Children Missing Education (CME) Team – Worcestershire Children First: 01905 843204
- Police: 999 (emergency) / 101 (non-emergency)
- NSPCC Whistleblowing Advice Line: 0800 028 0285 / [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Appendix 5: The Local Authorities Safeguarding Procedures

This appendix sets out the local safeguarding procedures that apply at Bredon School in line with Worcestershire Children First (WCC) and Worcestershire Safeguarding Children Partnership (WSCP) guidance. It is designed to give staff, governors, and inspectors a clear overview of local processes and contact details.

### 1. Early Help

- Staff should discuss emerging concerns with the DSL/DDSL.
- Where early help is appropriate, the DSL will lead or support an Early Help Assessment using Worcestershire's pathway.
- Referrals and support are coordinated through the Family Front Door: 01905 822666.
  - Out of hours: Emergency Duty Team: 01905 768020.
- Early Help requests are submitted via the Worcestershire Children First website: [www.worcestershire.gov.uk/earlyhelp](http://www.worcestershire.gov.uk/earlyhelp)
- Early Help will be monitored and reviewed regularly by the DSL/DDSL, escalating to Social Care if risks increase.

### 2. Children's Social Care Referrals

- Immediate safeguarding concerns (child at risk of significant harm / immediate danger) must be referred without delay to the Family Front Door: 01905 822666.
- Out of hours: Emergency Duty Team: 01905 768020.
- Anyone can make a referral. Staff making direct referrals must inform the DSL/DDSL as soon as possible.
- The DSL/DDSL will liaise with the receiving DSL if the child transfers school, ensuring all records are shared securely.

### 3. Allegations Against Staff – Worcestershire Local Authority Designated Officer (LADO) Referral Process:

- Any allegation that meets the harm threshold must be referred to the LADO within 1 working day.
- The LADO provides advice and guidance on whether the allegation meets the threshold for a formal referral and will coordinate the response with Children's Social Care, police and the employer.
- **The LADO can be contacted via:**
  - Telephone: 01905 846221
  - Email: [lado@worcschildrenfirst.org.uk](mailto:lado@worcschildrenfirst.org.uk)
  - Online Referral Form: Worcestershire LADO referral form
- **Referral steps:**
  - Allegation reported immediately to Headmaster (or Chair of Governors if Headmaster is subject).
  - Headmaster discusses with DSL and contacts the LADO within 1 working day.
- **LADO decides next steps:**
  - No further action (record only);
  - Employer to investigate internally;
  - Strategy meeting with LADO, police and Children's Social Care;
  - Referral to DBS/Teaching Regulation Agency where required.
  - All concerns and referrals must be documented on Confide.

The LADO will manage the case in line with Worcestershire procedures.

### 4. Escalation of Professional Concerns

If dissatisfied with the outcome of a referral or safeguarding decision, staff must follow the [WSCP Escalation Policy \(V4, Feb 2024\)](#):

- **Stage 1 (within 1-3 working days):**
  - Practitioner seeks to resolve professional concern or disagreement through discussion and/or meeting within 1-3 days (reflecting the level of risk to the child/adult).
- **Stage 2 (within 1-3 working days):**
  - Practitioner reports the issue about which there is professional disagreement to their line manager. Respective managers liaise within 1-3 days (reflecting the level of risk to the child/adult) to review available information and resolve if possible. Advice is sought from respective designated safeguarding leads if necessary.
- **Stage 3 (within 1-3 working days):**
  - The professional concern or disagreement is referred without delay through the line management structures of the respective agencies. Senior managers seek to resolve within 1-3 days (reflecting the level of risk to the child/adult).
- **Stage 4:**
  - Members for the respective organisations are informed, who will refer to the WSCP/WSAB Manager for the convening of an independently chaired resolution.

All escalation attempts must be documented on MyConcern / Confide, respectively.

#### **5. Female Genital Mutilation (FGM)**

- Teachers have a mandatory duty to report to the police if FGM is disclosed or suspected in a girl under 18.
- In Worcestershire, follow the WSCP FGM Pathway:
  - Immediate risk → Referral to Family Front Door 01905 822666.
  - FGM has taken place → Mandatory report to police (101/999), inform DSL, and refer to Social Care.
  - Health and support needs → Refer to health services and specialist FGM services.
  - Multi-agency response will include police, health, education and social care .

#### **6. Prevent Duty (Radicalisation & Extremism)**

- The school has a duty to prevent children being drawn into terrorism.
- Prevent Lead: Mr Alsidair Cradock, Head of Sixth Form, DDSL
- Concerns are referred to the Family Front Door: 01905 822666.
  - Out of hours: Emergency Duty Team: 01905 768020.
- Refer to the local Prevent team.
- Staff will access WSCP Prevent training and use government resources (e.g. Educate Against Hate).

#### **7. Child Criminal Exploitation (CCE) & Child Sexual Exploitation (CSE)**

- Indicators include unexplained gifts, associations with known groups, missing episodes, emotional changes, substance misuse, and repeated absences.
- Concerns should be raised with the DSL, who will make referrals via the Family Front Door.
- Police will be contacted if a child is in immediate danger: 999.

#### **8. Children Missing Education (CME)**

Bredon School follows the Children Missing Education Policy (July 2025) issued by Worcestershire Children First (WCC), in line with Children Missing Education Statutory Guidance (2024) and Keeping Children Safe in Education (KCSIE 2025).

- **Definition of CME**

- Children of compulsory school age who are:

- Not on a school roll, and
- Not receiving suitable education otherwise (e.g. Elective Home Education).
- This does not include children who are on roll but attending irregularly (these are addressed through the school's attendance and safeguarding procedures).

● **School responsibilities**

- Report to WCC within 5 days when a pupil joins or leaves the school at a non-standard transition point.
- Make reasonable enquiries before removing a pupil from roll, including contacting parents/carers, checking known addresses, and liaising with agencies.

● **Notify WCC immediately if a pupil:**

- Has 10 consecutive days of unauthorised absence,
- Has irregular attendance despite intervention, or
- Has prolonged absence due to medical needs likely to exceed 15 days.
- Record all CME concerns and actions on MyConcern, with oversight from the DSL.

● **Local authority responsibilities**

- WCC maintains the ONE database to track CME.
- A CME Lead Officer coordinates cases and reports to the Attendance & CME Strategic Lead.
- Weekly "Missing Mondays" meetings are held to review untraceable children until they are located or reach school leaving age.
- WCC may issue School Attendance Orders if a child is not receiving suitable education.

● **Safeguarding considerations**

- CME is always treated as a safeguarding risk, as prolonged absence may indicate neglect, exploitation, county lines, trafficking, radicalisation, or forced marriage.

● **Where safeguarding concerns are present, staff will:**

- Refer immediately to Children's Social Care via the Family Front Door (01905 822666).
- Contact the police (999/101) if the child is believed to be in immediate danger.

● **Contact details**

- CME Lead Officer: Matt Pooler – 01905 843204 / [cme@worcestershire.gov.uk](mailto:cme@worcestershire.gov.uk)
- Senior Education Engagement Officer - Independent schools (Attendance & CME) - 01905 / 843256 [MMatthews@worcestershire.gov.uk](mailto:MMatthews@worcestershire.gov.uk)
- Education Engagement Manager (Attendance & CME): Michelle Fowler – 01905 844667 / [Mfowler2@worcestershire.gov.uk](mailto:Mfowler2@worcestershire.gov.uk)
- Attendance Helpline: 01905 844440 (term time, 9am–4:30pm)
- Family Front Door: 01905 822666

**9. Safeguarding in Boarding**

- The school follows National Minimum Standards for Boarding and Worcestershire's local safeguarding pathways.
- Boarding staff liaise closely with the DSL on all safeguarding matters.
- Any incident involving boarding students will follow the same referral and escalation processes as above.

**10. Local Contacts – Quick Reference**

- Family Front Door (FFD): 01905 822666 (out of hours: 01905 768020)
- Police: 999 (emergency) / 101 (non-emergency)
- LADO: 01905 846221 / [lado@worschildrenfirst.org.uk](mailto:lado@worschildrenfirst.org.uk)
- CME Officer: 01905 843204 / [cme@worschildrenfirst.org.uk](mailto:cme@worschildrenfirst.org.uk)
- Attendance Helpline: 01905 844440 (term time, 9am–4:30pm)
- Prevent Team: 0121 251 0241 / [prevent@westmercia.police.uk](mailto:prevent@westmercia.police.uk)
- WSCP Website: [www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)