



Safeguarding Policy (DRAFT)	
Policy Owner	Deputy Head (Pastoral)
Version	2026.1
Effective from	1 st September 2026
Review Date	1 st September 2027

The commitment to diversity, equality, and inclusivity is at the heart of our values at Austin Friars. Equality means creating an environment where pupils have the chance to achieve their full potential, free from barriers, prejudice, and discrimination. Inclusion is about recognising that each pupil is unique and that their needs can be met in different ways. Diversity means recognising, respecting, and celebrating the added value that differences bring. Our unwavering dedication to our school values – Truth, Love and Unity - is how we fulfil our mission at Austin Friars. It is through our commitment to diversity, equality, and inclusivity that our pupils are empowered to be authentic and succeed.

Austin Friars is an equal opportunities employer and is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

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Important Contacts:

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL) and Deputy Head Pastoral	Claire Holmes	01228 550725 claireholmes@austinfriars.co.uk
Safeguarding mailbox	DDSL and DDSL team	safeguarding@austinfriars.co.uk
Head and Deputy DSL	Chris Hattam – (DDSL) - Head	01228 528042 Chrishattam@austinfriars.co.uk
Deputy DSL	Jonathon Clark (DDSL) - Head of Junior School	07535087675 jonathonclark@austinfriars.co.uk
	Katherine Quinn (DDSL) - Head of Lower School	01228 550 787 katherinequinn@austinfriars.co.uk
	Jeremy Tiffen (DDSL) – Head of Middle School	01228 550721 jeremytiffen@austinfriars.co.uk
	Stuart Parry (DDSL) – Head of VI Form	01228 550709 stuartparry@austinfriars.co.uk
	Abby Simpson (DDSL) - EYFS	01228 550 722 abigailsimpson@austinfriars.co.uk
	Charlotte Vaughan – Junior School	CharlotteVaughan@austinfriars.co.uk
Trustee i/c Safeguarding	Michelle Byrne	Michellebyrne@austinfriars.co.uk
Chair of Trustees	Chris Bull	chrisbull@austinfriars.co.uk
Cumberland Children's Advice and Support Service (CCASS)		0333 240 1727
Local authority designated officer (LADO)		0300 303 3892 lado@cumberland.gov.uk
Marsh 24 Hour counselling helpline		0117 933 0687

A full list of contacts is provided in appendix 1.

Scope of Policy

1.1 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 with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

1.2 Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2026\)](#), and the [Maintained schools: governance guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see below).

This policy is also based on the following legislation:

- Part 3 of the schedule to [The Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our trustees and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting 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
- [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse
- [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
- This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

Ausin Friars 3 safeguarding partners are: Cumberland Council; Cumbria Constabulary and North East and North Cumbria ICB (NHS).

1.3 Safeguarding definitions

Safeguarding and promoting the welfare of children is everyone's responsibility and is defined as:

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

(KCSIE 2026)

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 2 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 2 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

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:

- Cumberland Council
- Cumbria Constabulary
- North East and North Cumbria ICB (NHS).

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.

1.4 Equality Statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (See section 7)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (See section 7.5)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carers has expressed an intention to remove them from school to be home educated

1.5 Recording, Record keeping and storing and sharing information

Accurate record-keeping is essential for identifying patterns, evidencing decisions, supporting safeguarding interventions and promoting accountability. Austin Friars maintain safeguarding records in accordance with its Records Retention Schedule, Data Protection Policy and statutory guidance.

All safeguarding concerns, discussions, decisions and the rationale for those decisions must be recorded promptly and accurately. This includes instances where referrals are made, and where a decision is taken not to make a referral to Children's Social Care, the Prevent programme or another agency. Where there is any uncertainty about whether information should be recorded, staff should seek advice from the DSL.

The School will maintain a secure, electronic, chronological record of safeguarding concerns and incidents through CPOMS. Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and addressed.
- Any actions taken, decisions reached and outcomes achieved.
- A record of referrals made, and information shared with external agencies where appropriate.

Any paper-based safeguarding records will be stored securely in a locked cabinet within a restricted-access area. Electronic records are held securely with appropriate access controls to ensure confidentiality and compliance with data protection requirements.

Safeguarding records relating to individual pupils will be retained in line with the School's Records Retention Schedule (see appendix 8 for detail) and applicable statutory requirements. Information will be shared only where it is lawful, necessary, proportionate and in the best interests of the child, in accordance with local safeguarding procedures and relevant data protection legislation. **The data protection laws do not prevent the sharing of information for the purposes of keeping children safe.**

Where a pupil who is, or has been, the subject of safeguarding concerns moves to another school, the DSL will ensure that the child protection file is transferred securely and separately from the main pupil record as soon as possible, and within:

- five school days for an in-year transfer; or
- the first five school days of the start of a new term.

Where safeguarding concerns are significant, complex or involve statutory agencies, the DSL will speak directly with the DSL at the receiving school to ensure that all relevant information is shared and that appropriate support and safeguarding arrangements are in place from the outset.

Records are kept on CPOMS with separate profiles for each child.

1.6 Complaints and concerns about school safeguarding policies

Complaints against staff

Austin Friars is committed to ensuring that all safeguarding concerns and complaints are taken seriously, investigated appropriately and resolved in a timely and transparent manner.

Complaints relating to safeguarding may be raised by pupils, parents, carers, staff, volunteers, visitors or members of the wider community. These may include concerns relating to the welfare of pupils, behaviour between pupils, supervision arrangements, site security, health and safety matters, online safety, safeguarding procedures or any aspect of the School's safeguarding provision.

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 4).

Other complaints

Any safeguarding complaint will be referred to the Designated Safeguarding Lead (DSL) or, where appropriate, the Head. The School will consider whether the matter indicates that a child is suffering, or is at risk of suffering, abuse, neglect, exploitation or significant harm. Where safeguarding concerns are identified, the School will follow the procedures set out within this policy and, where necessary, consult with or refer to Children's Social Care, the Police, the Local Authority Designated Officer (LADO) or other relevant agencies.

Concerns raised by pupils will be managed sensitively and in a manner appropriate to their age, understanding and needs. Pupils will be reassured that they have been listened to and that appropriate action will be taken. Records of safeguarding complaints and actions taken will be maintained securely in accordance with the School's safeguarding recording procedures.

Parents who remain dissatisfied after a safeguarding complaint has been considered may access the School's Complaints Procedure. However, where safeguarding investigations are being conducted by external agencies, the School may be unable to share detailed information until those processes have concluded. The welfare of the child will remain paramount throughout.

Within the Early Years Foundation Stage (EYFS), complaints relating to safeguarding and welfare requirements will be managed in accordance with the EYFS Statutory Framework. Parents will be informed of their right to contact Ofsted if they believe that the School is not meeting EYFS safeguarding and welfare requirements.

Whistleblowing

Austin Friars is committed to maintaining the highest standards of openness, integrity and accountability. The School encourages all staff, volunteers and contractors to raise concerns about poor or unsafe practice, potential failures in safeguarding arrangements, or any conduct that may place a child at risk. All concerns will be taken seriously and investigated appropriately.

The School's Whistleblowing Policy should be used where concerns relate to:

- Poor or unsafe safeguarding practice.
- Failures to follow safeguarding procedures.

- Concerns about the conduct of staff, volunteers, contractors or trustees.
- Attempts to conceal safeguarding concerns.
- Breaches of statutory guidance, professional standards or the Staff Code of Conduct.
- Any action or omission that may place a child at risk of harm.

Staff should normally raise concerns with the Head or DSL in the first instance. Where the concern relates to the Head, or where a member of staff feels unable to raise the matter internally, concerns may be reported to the Chair of Trustees. Concerns may be raised verbally or in writing and should include as much information as possible to assist any investigation.

The School will:

- Treat all whistleblowing concerns seriously.
- Investigate concerns promptly and fairly.
- Take appropriate action where concerns are substantiated.
- Maintain confidentiality wherever possible.
- Protect individuals who raise genuine concerns from victimisation, detriment or retaliation.
- Record actions taken and outcomes appropriately.

In accordance with *Keeping Children Safe in Education*, staff who feel unable to raise concerns internally, or who believe that concerns are not being addressed appropriately, may seek advice or report concerns through external whistleblowing routes. These include the NSPCC Whistleblowing Advice Line and other statutory reporting channels. Staff should be aware that safeguarding concerns should never be ignored because they are uncertain whether behaviour constitutes abuse or poor practice.

For members of staff working within the EYFS, any concerns that another member of staff may pose a risk of harm to children must be reported immediately in accordance with the EYFS Statutory Framework, this policy and the School's Whistleblowing Policy. The School will ensure that all staff understand how to raise concerns and are supported in doing so.

No member of staff will suffer any detriment for raising a genuine safeguarding concern in good faith. The School regards a culture of professional curiosity, openness and challenge as essential to safeguarding children effectively

2. Roles, responsibilities and Duties

2.1 Introduction

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees 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 preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. 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

2.2 Responsibilities of all staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance [Keeping Children Safe in Education](#) (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and 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 (for example, 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 handbook which includes: staff behaviour policy and code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the rewards, behaviour and conduct policy, e-safety policy and the safeguarding response to children who go missing from education/who are absent from education
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The family help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- 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
- The process for community-based Family Help assessments
- 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, exploitation and modern slavery, 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)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- 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 mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying

- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 5 of this policy outlines in more detail how staff are supported to do this.

2.2.1 One to one working with Pupils

Austin Friars recognises that there are occasions when staff need to work individually with pupils for educational, pastoral, safeguarding, SEND, medical or wellbeing reasons. One-to-one working can provide valuable support for pupils but must always take place in a manner which safeguards both pupils and staff.

Staff undertaking one-to-one work with pupils will:

- Ensure that one-to-one sessions are necessary, appropriate and proportionate.
- Wherever possible, use rooms with vision panels, windows or other means of visibility.
- Conduct meetings in locations where other adults are nearby and where the activity can be observed, whilst maintaining appropriate privacy and dignity for the pupil.
- Keep doors open where appropriate and safe to do so. Where doors need to be closed for confidentiality or safeguarding reasons, this should be justifiable and proportionate.
- Ensure that colleagues are aware of planned one-to-one sessions, particularly where they take place outside normal classroom arrangements.
- Never seek to isolate themselves unnecessarily with a pupil.
- Maintain professional boundaries at all times and act in accordance with the Staff Code of Conduct.
- Record and report any safeguarding concerns arising from one-to-one work in accordance with this policy.
- Ensure any online or virtual one-to-one contact is conducted through School-approved systems and in line with the School's Online Safety, Acceptable Use and Staff Code of Conduct policies.
- Be mindful that children may disclose safeguarding concerns during one-to-one conversations and must follow the procedures set out in this policy if a concern is raised.

Transporting Pupils

- Staff should avoid transporting pupils in a one-to-one situation unless there is a clear educational, pastoral or welfare reason for doing so.
- Where transport of a pupil is required, parental consent and authorisation from an appropriate senior member of staff should be obtained wherever possible.
- The reasons for the journey and arrangements made should be recorded appropriately.
- Consideration should be given to whether another adult can accompany the journey.

Specialist One-to-One Activities

Staff involved in music tuition, learning support, counselling, mentoring, coaching, peripatetic teaching, interventions or similar activities must ensure that safeguarding arrangements remain visible, transparent and appropriate. Where possible, sessions should take place in locations that allow observation by others whilst preserving the dignity and confidentiality of the pupil.

2.3 Role of Designated Safeguard Lead and supporting staff

The DSL is a member of the senior leadership team. Our DSL is Mrs Claire Holmes, Deputy Head Pastoral. 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.

Outside of term time the DSL can be contacted through email and through the shared safeguarding email (safeguarding@austinfriars.co.uk). Details can be found in section 2.3.1.

When the DSL is absent, the Deputy Designated Safeguard Leads (DDSL) will act as cover. Further contact details can be found on after the contents and in appendix 1.

If the DSL and DDSL's are not available or absent, contact the Head. A

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
- The DSL is the Prevent lead

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
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and DDSL's are set out in their job description.

If the DSL is unavailable, safeguarding responsibilities will be carried out by a DDSL. In the absence of both the DSL and DDSLs, the Head will assume responsibility for the role.

2.3.1 Shared Safeguarding Email Inbox

Austin Friars maintains a dedicated safeguarding email address (safeguarding@austinfriars.co.uk) which is monitored by the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs).

Access to this mailbox is restricted to members of the safeguarding team and is managed in accordance with the School's data protection and information security procedures. The shared mailbox ensures that safeguarding concerns, disclosures and requests for advice can be received and acted upon promptly, including during periods when the DSL is absent or unavailable.

Pupils, parents, staff and external agencies may use this address to raise safeguarding concerns, seek support or share information. All safeguarding communications received through the mailbox will be treated confidentially, recorded appropriately on the School's safeguarding systems where required and responded to in accordance with this policy.

The shared mailbox forms part of the School's wider safeguarding arrangements to ensure continuous safeguarding oversight and timely access to safeguarding support.

2.4 Roles in EYFS

The DDSLs with specific responsibility for safeguarding in EYFS settings, will inform the DSL of any serious allegations of harm or abuse, by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises. The DSL will follow the foregoing procedures in respect of these allegations.

The EYFS Designated Safeguarding Lead (DSL) or Deputy must ensure that all statutory EYFS safeguarding requirements are met, including:

- The maintenance of statutory staff:child ratios (Under 2s: 1:3; Age 2: 1:5; Age 3+: 1:8 or 1:13 with QTS/EYPS).
- The operation of the key person system, ensuring every child has an identified key person to support their emotional wellbeing and communication with parents.
- The monitoring of compliance with the Paediatric First Aid (PFA) requirement: at least one person with a full 12-hour PFA certificate present on site and on outings at all times. Certificates must be renewed every 3 years, and parents.
- Ensuring that all staff who qualified after June 2016 are PFA trained in order to be counted in ratio as of September 2025, and ensuring that there is a staff member qualified in PFA present and in direct contact with the children at all snack and meal times.
- Awareness of staff suitability checks, including disqualification checks, carried out by the People Team, and notification to Ofsted within 14 days where a staff member's suitability may be compromised.

As a registered EYFS establishment the School has a responsibility to report any abuse to Ofsted within 14 days of awareness of an incident. Ofsted can be contacted in three ways.

1. Telephone: 0300 123 1231 (Monday to Friday from 8.00am to 6.00pm)
2. Email: enquiries@ofsted.gov.uk
3. Letter: Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD

2.4.1 One-to-One working with EYFS

Where one-to-one interaction is required in the EYFS, staff will ensure that children remain appropriately supervised and safeguarded at all times. One-to-one work may take place for personal care, first aid, medical needs, emotional support, assessment activities or safeguarding reasons. Staff will:

- Follow the intimate care and personal care procedures where applicable.
- Maintain appropriate visibility wherever possible.
- Ensure another member of staff is aware of the activity being undertaken.
- Consider the age, stage of development and individual needs of the child.
- Record any significant safeguarding, medical or welfare concerns in accordance with School procedures.
- Maintain professional boundaries and act in accordance with the EYFS Statutory Framework and the School's Staff Code of Conduct.

2.5 Roles of Trustees

The Trustees will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head 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 member of the Trustees to monitor the effectiveness of this policy in conjunction with the full Trustee board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year. 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
 - Ensuring that reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
 - 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, trainee teachers, volunteers and contractors). Appendix 4 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 4).

All Trustees will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 9.3 of this policy has information on how trustees are supported to fulfil their role.

2.6 Roles of Head

The Head 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 4)
- 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
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

3. Confidentiality

Austin Friars recognises that effective safeguarding depends upon timely, lawful and proportionate information sharing. Staff must balance a pupil's right to privacy with the School's duty to safeguard and promote the welfare of children. The welfare of the child remains the School's paramount consideration.

Staff should never guarantee confidentiality to a pupil who wishes to disclose information. Where a safeguarding concern is identified, information will need to be shared with those professionals who need to know in order to protect the child or others from harm. At the earliest appropriate opportunity, staff should explain to pupils that concerns may need to be shared with the Deputy Head Pastoral (DSL), DDSLs and, where required, external agencies.

All staff must understand that concerns about a child should be shared on a need-to-know basis and only with those who have a legitimate safeguarding role. Information relating to safeguarding concerns must not be discussed casually, shared unnecessarily or disclosed to individuals who do not require the information to fulfil their professional responsibilities.

The School will ensure that appropriate arrangements are in place for sharing information:

- Within the School, including between the DSL, Deputy DSLs, senior leaders and relevant staff.
- With Children's Social Care, the Police, health services and other safeguarding partners where required.
- With other professionals involved in supporting the child and family.
- With receiving schools or colleges when a pupil transfers, in accordance with statutory guidance and local safeguarding arrangements.

The Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 do not prevent the sharing of information for safeguarding purposes. Fears about sharing information must never stand in the way of protecting a child from harm or promoting their welfare. Staff should seek advice from the DSL where they are uncertain about information sharing, but this uncertainty must not result in unnecessary delay.

Where a child is considered to be at risk of significant harm, suffering abuse, neglect or exploitation, information may be shared without consent where there is a lawful safeguarding basis for doing so. The

School will follow the principles set out within the Government's information sharing guidance and local safeguarding procedures when making such decisions.

When responding to reports of child-on-child abuse, sexual violence, sexual harassment or other safeguarding concerns, the School will carefully consider the wishes and feelings of the child. However, the child's request for confidentiality may not always be possible where there is a risk of harm to the child or others, or where statutory agencies need to be involved. Decisions regarding information sharing will be made by the DSL, who will balance the child's wishes against the School's safeguarding responsibilities.

The School will take all reasonable steps to protect the privacy of pupils and families involved in safeguarding matters. Safeguarding records will be stored securely, access will be restricted to authorised personnel and information will be handled in accordance with the School's safeguarding, record retention, information security and data protection procedures. Further information regarding safeguarding record keeping, storage, retention and transfer can be found in Section 1.6 and Appendix 8 of this policy.

4. Risks and Indicators

4.1 Recognising abuse and neglect, and taking action

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

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- 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
- 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

Staff, volunteers and trustees 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 DDSL)’.

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

Make a referral to local authority children’s social care and/or the police **immediately on 999** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral to Cumberland Children’s Advice and Support Service (CCASS) on 03332401727**

(<https://www.cumberland.gov.uk/health-and-social-care/children-and-families/child-protection-and-safeguarding/report-concern-about-child>)

Speak to the DSL (see section 2.3) as soon as possible if you make a referral directly.

4.3 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. **Do not promise to keep it a secret**
- 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
- Add it to CPOMS or if written, sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children’s social care and/or the police directly (see 4.2), 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
- 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.

4.4. If you discover that Female Genitalia Mutilation (FGM) has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) 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 5 of this policy.

Any teacher who either:

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

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

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.

Reporting is completed by calling 101. When you make a report to the police, you should be prepared to provide the call handler with the following information:

- explain that you are making a report under the FGM mandatory reporting duty
- your details:
 - name
 - contact details (work telephone number and e-mail address) and times when you will be available to be called back
 - role
 - place of work
- details of your organisation's designated safeguarding lead:
 - name
 - contact details (work telephone number and e-mail address)
 - place of work
- the girl's details:
 - name
 - age/date of birth
 - address

You will be given a reference number for the call and should ensure that you document this in your records

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.

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

Figure 1 below, before section 4.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from Cumberland Children's Advice Support Service (CCASS) directly on 0333 240 1727. 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.

Family help assessment

If a family 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 a family 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 Cumberland children's social care, through the Family Help support team, if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Family Help Support team for Austin Friars

Claire Murphy – 0333 240 1727

Referral

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

If you make a referral directly (see section 4.2), you must tell the DSL as soon as possible.

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

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.

4.5 If you have a concern about extremism

Radicalisation is the process of adopting extreme ideas.

Extremism is the destination or set of beliefs that reject core democratic values and promote hatred, intolerance or violence.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from Cumberland Children's Advice Support Service (CCASS) directly on 0333 240 1727, who will direct you to children's social care as appropriate. 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 support terrorism, or the local authority children's social care team.

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

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

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

4.6 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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

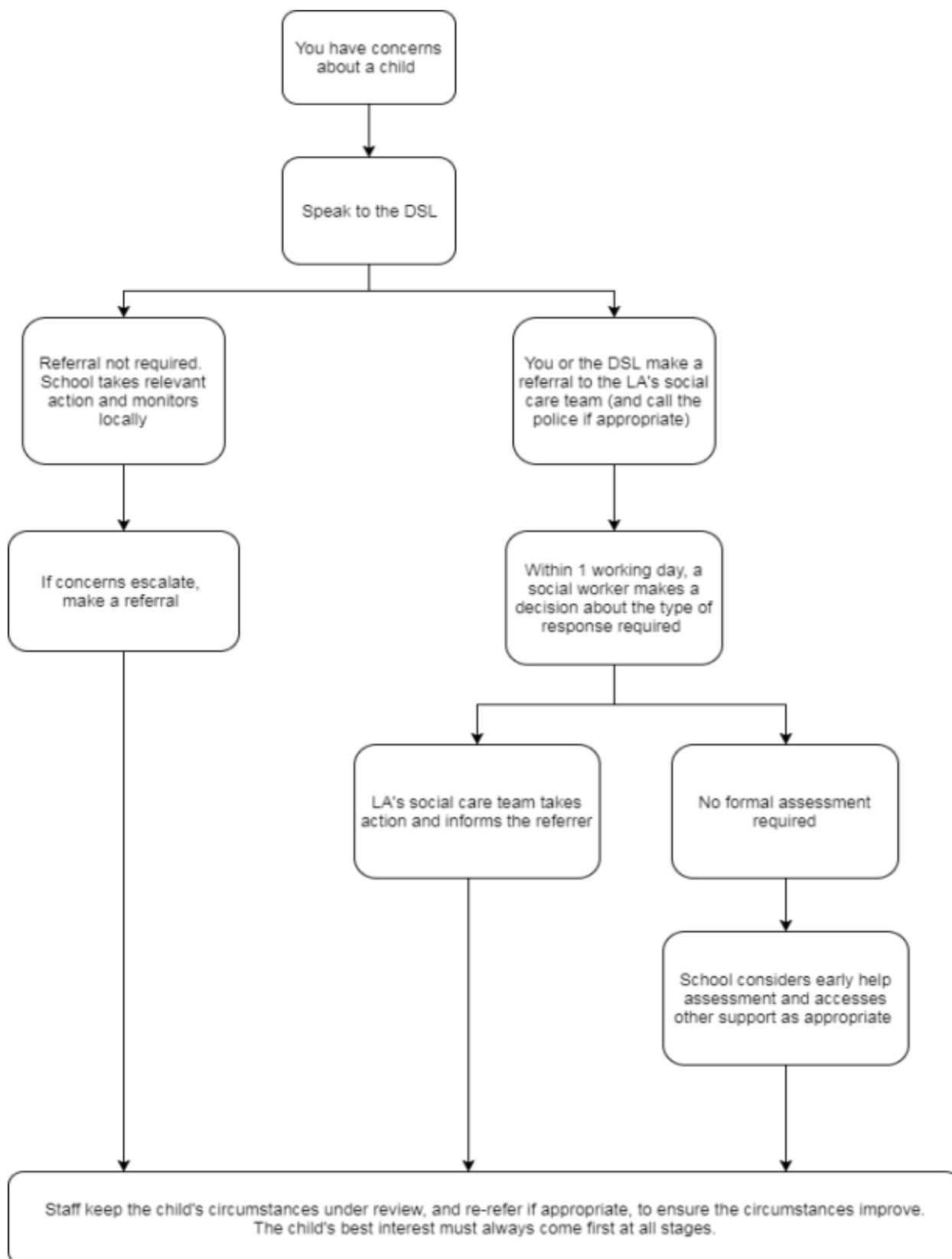
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 4.2. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

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

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 4.2 for what to do.)



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

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head or DSL as soon as possible. If the concerns/allegations are about the headteacher, contact to the Chair of Trustees (details can be found in Appendix 1).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the head, report it directly to the local authority designated officer (LADO) (details in Appendix 1).

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.

Where appropriate, the school will inform ISI and Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 4 for more detail).

If there is concern about the safeguarding practices in the school, all staff should feel able to raise these with the Senior Leadership team through the complaints policy and whistleblowing policy.

4.8 Allegations of abuse made against another pupil (Child on child abuse)

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

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. However, 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 making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 5 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 on CPOMS and tell the DSL, but do not investigate. Staff should not view or forward any images of children.
- The DSL will contact the Cumberland Children’s Advice Support Service (CCASS) 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 CCASS) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 4.10 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
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- 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
 - That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

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, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

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

4.9 Making or sharing of nudes or semi nudes

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. 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 making or 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 CCASS and 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

If it is necessary to refer an incident to the police, this will be done through Sam Wilkinson, Child Centred Policing Team (CCPT) Cumberland (details in appendix 1)

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded on CPOMS. The record-keeping arrangements set out in section 1.6 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our PSHE and wider school curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

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

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

4.10 Reporting system for our pupils

Pupils are encouraged to report any concern about their own safety or wellbeing, or that of another pupil, including concerns relating to behaviour outside School or online.

- A pupil may speak to **any trusted adult** in School. This may include their Tutor, Key Person, Head or Assistant Head of School, Head of House, Chaplain, First Aid and Health Responder, a member of the pastoral team, the DSL or a Deputy DSL.
- Pupils do not need to decide whether something is “serious enough” before reporting it. If something is worrying them, making them feel uncomfortable or unsafe, they should tell an adult.
- Pupils may report concerns verbally or in writing. They may also use the **locked safeguarding suggestion box in the Library**, including where they would initially prefer to raise a concern without giving their name.
- Pupils may also contact the safeguarding team through the dedicated safeguarding email address (safeguarding@austinfriars.co.uk), which is monitored by the DSL and DDSLs.
- A pupil may ask a friend to accompany them when speaking to an adult. A friend may also report a concern on another pupil’s behalf, although staff may subsequently need to speak directly with the pupil concerned.
- Age-appropriate arrangements will be provided for younger children, including opportunities to speak with their Key Person, class teacher or another familiar adult and the Junior school have a worry box, which is emptied regularly.
- Reasonable adjustments and alternative ways of communicating will be provided for pupils who have SEND, communication needs, English as an additional language or any other difficulty which may make reporting a concern harder. KCSIE recognises that vulnerability, disability and language barriers may affect a child’s ability or readiness to disclose concerns.
- Pupils are reminded of the different ways to report concerns through induction, assemblies, PSHE, tutor time and house meetings, posters, information screens and regular safeguarding messages.
- All reports will be taken seriously. Pupils will be listened to respectfully, reassured that they have done the right thing by speaking up and will not be made to feel that they are causing a problem. KCSIE specifically states that pupils should be reassured that they will be supported and kept safe and should never be made to feel ashamed for making a report.
- Staff will explain what will happen next. Pupils will be told that information cannot always remain confidential and may need to be shared with the DSL or other appropriate professionals to keep them or another child safe.
- The pupil’s wishes and feelings will be considered when decisions are made about the action or support required, although the School may need to act where this is necessary to safeguard the pupil or others.
- Pupils will be kept appropriately informed and supported following a report. Wherever possible, they will be given a named adult whom they can approach for further help.
- Pupils may safely express their views about the support they receive and about the effectiveness and accessibility of the School’s reporting arrangements.
- Reporting routes will be reviewed regularly through pupil voice, safeguarding monitoring and feedback to ensure that they remain visible, accessible and trusted by pupils.

5. Online Safety and the use of mobile technology

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

To address this, Austin Friars aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)

- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

In accordance with *Keeping Children Safe in Education*, the School is committed to safeguarding pupils from the four categories of online risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

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

- Educate pupils about online safety as part of our curriculum. Including:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff as part of their induction, on safe internet use and online safeguarding issues including around cyber-bullying, the risks of radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff member will receive refresher training as required and at least once each academic year
- Educate parent and carers about online safety via our website, communication sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make all pupils, parents/carers, staff, volunteers and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Review the safeguarding and child protection policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

5.1 Use of Phones, Cameras and smart technology

The School has a specific view on the use of such devices in the Pre School, and the whole school in general. All parents are informed by letter of our policy with regard to photographing children and use of photographs in any publications, websites or the local media. Parents/pupils are asked to fill in the School's Media/Photograph consent form during the admissions process.

5.2 Staff Use of Mobile Phones and Devices

Staff may bring personal mobile phones onto School premises; however:

- Personal devices must not be used whilst supervising pupils unless required in an emergency.
- Ideally, personal devices should only be used during non-contact time.
- Staff must not use personal devices to photograph, record or communicate with pupils (without direct permission from DSL or Head).

- Images or recordings of pupils may only be taken using School-approved devices for legitimate educational purposes and in accordance with parental consent arrangements.
- Staff must adhere to the Staff Code of Conduct, Acceptable Use Policy and Data Protection Policy at all times.

5.3 Photography and Images

The School obtains appropriate consent regarding the use of photographs and recordings through its parental consent procedures.

The School will ensure that:

- Photographs or recordings of pupils are only taken where appropriate consent has been obtained.
- Consent arrangements are reviewed regularly and may be withdrawn at any time.
- Pupils in the Senior School are given opportunities to review or renew permissions where appropriate.
- Images are used only for authorised educational, safeguarding, administrative or promotional purposes.
- Images are stored securely and accessed only by authorised individuals.
- Where consent is not provided, alternative methods of recording achievement or participation will be used.

Pupils undertaking examination coursework requiring photographic evidence must obtain appropriate written consent before photographing others.

5.4 EYFS Mobile Phones and Cameras

In the Early Years Foundation Stage:

- Parents, visitors and volunteers must not use cameras, video equipment or personal devices with photographic capabilities whilst on site or during EYFS activities and visits unless specifically authorised by the DSL or Head.
- Staff are prohibited from using personal mobile phones or cameras when children are present.
- Only School-owned devices may be used to take photographs or recordings of children.
- Any use of digital imaging will form part of the relevant risk assessment.
- Devices will be stored securely when not in use.

5.5 Parents and Visitors

The School recognises that parents may wish to capture memories of events such as concerts, performances and sporting fixtures. Parents may therefore take photographs or recordings of their own child for personal use, provided that:

- Such use does not cause disruption or compromise safeguarding arrangements.
- Images of other children are not intentionally captured or shared.
- Photographs or recordings containing other pupils are not posted on social media or shared electronically without appropriate consent.

5.6 Reporting Concerns

Pupils, parents, carers and staff are encouraged to report any online safety concerns immediately to the DSL, DDSL or Head or through the dedicated safeguarding email (safeguarding@austinfriars.co.uk).

Concerns may relate to online abuse, bullying, exploitation, grooming, inappropriate content, harmful online behaviour, criminal activity, radicalisation, malicious communications, artificial intelligence misuse or any other issue that may place a child at risk.

All online safety concerns will be managed in accordance with the procedures set out in this Safeguarding and Child Protection Policy and recorded appropriately on the School's safeguarding systems.

5.7 Pupils

In line with *Keeping Children Safe in Education 2026*, the *Children's Wellbeing and Schools Act 2026* and the Department for Education's statutory guidance *Mobile Phones in Schools*, Austin Friars is a **mobile phone-free environment by default**.

Pupils must not have access to mobile phones or other smart technology with similar functionality during the school day, including lessons, transitions between lessons, breaktimes and lunchtime, except where a specific exception has been authorised by the School. Mobile phones brought onto site must be switched off and stored securely in accordance with School procedures.

The School recognises that some pupils require access to a device because of a medical condition, disability, pastoral need or other exceptional circumstance, reasonable adjustments will be considered on an individual basis.

Any misuse of mobile phones or smart technology will be dealt with in accordance with the Behaviour Policy, Acceptable Use Policy and the Department for Education's guidance on searching, screening and confiscation.

Staff have the power to search for and confiscate mobile phones where this is lawful, necessary and proportionate, and where there are concerns relating to safeguarding, behaviour or compliance with School rules (as set out in [DfE's guidance on searching, screening and confiscation](#) document). Pupils are encouraged to report any concerns arising from online activity or the misuse of mobile technology to a member of staff, the DSL or a Deputy DSL immediately.

5.8 Filtering and Monitoring

The School computer system uses an internet filtering package (Securly) that filters inappropriate sites with both known "Blocked pages" and page analysis for unknown sites. 'Sites of concern' are flagged to DSL/ DDSLs as soon as they are searched/ requested. Parents will be regularly updated/informed of online safety particularly when 'blended learning' (both in School and online) is necessary.

Review of the filtering is checked to ensure their effectiveness is carried out at least once every academic year. These reviews should be carried out by the DSL, with the support of the school's IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of these checks are kept.

5.9 Artificial Intelligence (AI)

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

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

Austin Friars will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with *Keeping Children Safe in Education* (KCSIE).

6. Notifying Parents or Carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team CCASS 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 CCASS 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, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

7. Children at risk and additional Safeguarding Considerations

Austin Friars recognises that some pupils may be at increased risk of harm, abuse, neglect or exploitation and may require additional support and protection. All staff should be aware that safeguarding incidents and behaviours can be associated with factors outside the School and/or can occur between children. Staff must maintain an attitude of "*it could happen here*" and remain vigilant to the additional vulnerabilities that may affect some pupils.

Particular attention will be given to pupils who:

- Have special educational needs and/or disabilities (SEND);
- Have physical or mental health needs or medical conditions;
- Are young carers;
- Have a social worker;
- Are looked-after or previously looked-after children;
- Are experiencing family difficulties, adversity or trauma;
- Are at risk of exploitation, abuse or neglect;
- Are lesbian, gay or bisexual (LGB+).

The School recognises that these pupils may face additional barriers to recognising, reporting or escaping abuse and may require enhanced pastoral support. When considering safeguarding concerns, staff will always take account of the individual needs, vulnerabilities and circumstances of the child and will not make assumptions that indicators of possible abuse, neglect, exploitation or harm are solely related to a pupil's disability, health condition or personal circumstances.

The Designated Safeguarding Lead (DSL) will work closely with relevant staff, including the SENCO, Heads of School, pastoral leaders, medical staff and external agencies, to ensure that pupils receive timely and effective support which promotes their safety, welfare and educational outcomes.

7.1 Pupils with SEND or Medical Conditions

Austin Friars recognises that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Research demonstrates that children with disabilities are more vulnerable to abuse and neglect than their peers.

Additional safeguarding concerns may include:

- Assumptions that changes in behaviour, mood, presentation or injuries are linked to a child's disability or health condition without further investigation.
- Increased vulnerability to bullying, including prejudice-based bullying and online abuse.
- Social isolation and difficulties developing protective peer relationships.
- Communication difficulties which may affect a pupil's ability to recognise, understand or report abuse.
- Greater dependence on adults for personal, medical or intimate care.
- Difficulties understanding online risks, including misinformation, manipulation and harmful online content.

The School seeks to reduce these barriers through a strong pastoral system, specialist SEND support, appropriate reasonable adjustments and effective communication strategies. Any safeguarding concerns involving a pupil with SEND will involve close liaison between the DSL, Deputy DSLs, SENCO and other relevant professionals. Additional pastoral support and monitoring will be implemented where required.

7.2 Pupils with Medical Conditions

The School recognises that medical conditions can increase a child's vulnerability in certain circumstances. Whilst an incident relating to the management of a medical condition does not, in itself, constitute a safeguarding concern, a referral may be necessary where there is evidence that a child is being neglected, abused or placed at risk because of their medical needs.

Examples may include repeated failure to provide essential medication, withholding medical information from the School, or failing to seek appropriate medical treatment for a child. Concerns of this nature will be assessed by the DSL and referred to external agencies where appropriate.

7.3 Young Carers

The School recognises that pupils with caring responsibilities may experience additional pressures that can affect their wellbeing, attendance, behaviour, academic progress and mental health.

Staff will seek to identify young carers at the earliest opportunity and work with families and relevant agencies to ensure that appropriate support is in place. The School's pastoral team, Heads of School and DSL will work together to ensure that young carers have access to the support they need both within School and through external services where appropriate.

7.4 Pupils with a Social Worker

Children who have, or have previously had, a social worker may be particularly vulnerable due to experiences of abuse, neglect, family adversity, trauma or exploitation.

Where the School is aware that a pupil has a social worker, this information will be shared appropriately with relevant staff on a need-to-know basis. The DSL will work closely with social workers and other professionals to support the child and ensure that decisions relating to attendance, behaviour, wellbeing, safeguarding and educational provision are made in the child's best interests.

This information will be taken into account when considering issues such as unauthorised absence, missing education, changes in behaviour, emotional wellbeing and the provision of additional support.

7.5 Looked-After and Previously Looked-After Children

Austin Friars recognises that looked-after and previously looked-after children can be particularly vulnerable and may have additional safeguarding and educational needs arising from their experiences before entering care.

The School will ensure that staff have the knowledge and understanding necessary to safeguard these pupils effectively. Relevant staff will have access to information relating to a child's legal status, care arrangements and contact arrangements where appropriate.

The DSL will maintain effective links with social workers, carers and Virtual School Heads and will work closely with the member of staff responsible for promoting the educational achievement of looked-after and previously looked-after children. Together they will ensure that safeguarding concerns are identified and responded to swiftly, and that appropriate educational and pastoral support is provided.

7.6 Pupils who are Lesbian, Gay or Bisexual (LGB+)

The School recognises that being lesbian, gay or bisexual is not, in itself, a safeguarding concern and does not place a child at increased risk of harm. However, pupils who are, or who are perceived by others to be, lesbian, gay or bisexual may be vulnerable to bullying, discrimination, harassment or prejudice-based incidents.

Austin Friars is committed to promoting a culture of dignity, respect and inclusion in which all pupils feel safe, valued and supported. Any incidents of discriminatory behaviour or bullying will be addressed promptly in accordance with the Behaviour Policy and Anti-Bullying Policy.

Pupils who may require support in relation to their identity will have access to the School's pastoral systems, trusted adults, Heads of School, Chaplaincy, DSL team and other appropriate sources of support. Any safeguarding concerns arising from discrimination, harassment or bullying will be reported to the DSL and managed in accordance with the School's safeguarding procedures.

8. Pupils who are questioning their gender

8.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. Austin Friars will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment and will take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking careful approach

The DSL will lead in these cases.

8.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

8.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil

presenting as the opposite biological sex (“social transition”), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child’s parents/carers have been involved (as set out in [Keeping Children Safe in Education](#) (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school’s evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child’s request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child’s wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

8.4 Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms, showers or residential accommodation in school or on trips which are designated for the opposite biological sex, with no exceptions.

8.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children’s safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

9. Staff Training

9.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures (section 1.7) 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:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas. They will also have training on cyber security to strengthen resilience, reduce the risk of disruption, prevent data breaches, and mitigate safeguarding risks.

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

Contractors will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

9.2 The DSL and DDSL's

The DSL and DDSL's 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 briefings, meeting other DSLs, local police liaison team or taking time to read and digest safeguarding developments, locally from CSCP and nationally).

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

9.3 Trustees

All trustees 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
- 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 Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the head, they receive training in managing allegations for this purpose.

9.4 Safer 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 3 of this policy for more information about our safer recruitment procedures.

10. Links with other policies

This policy links to the following policies and procedures, which can be found on the [school website](#):

- Behaviour, Rewards and conduct
- Staff Handbook – (Behaviour and Code of conduct)
- Complaints
- Attendance
- Online Safety
- EYFS Policies
- Curriculum Policy
- AI Policy – TBC
- PSHE Policy
- Anti Bullying Policy
- IT Acceptable use policy

Appendix 1: Useful Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL) and Deputy Head Pastoral	Claire Holmes	01228 550725 claireholmes@austinfriars.co.uk
Safeguarding mailbox	DDSL and DDSL team	safeguarding@austinfriars.co.uk
Head and Deputy DSL	Chris Hattam – (DDSL) - Head	01228 528042 Chrishattam@austinfriars.co.uk
Deputy DSL	Jonathon Clark (DDSL) - Head of Junior School	07535087675 jonathonclark@austinfriars.co.uk
	Katherine Quinn (DDSL) - Head of Lower School	01228 550 787 katherinequinn@austinfriars.co.uk
	Jeremy Tiffen (DDSL) – Head of Middle School	01228 550721 jeremytiffen@austinfriars.co.uk
	Stuart Parry (DDSL) – Head of VI Form	01228 550709 stuartparry@austinfriars.co.uk
	Abby Simpson (DDSL) - EYFS	01228 550 722 abigailsimpson@austinfriars.co.uk
	Charlotte Vaughan – Junior School	CharlotteVaughan@austinfriars.co.uk
Trustee i/c Safeguarding	Michelle Byrne	Michellebyrne@austinfriars.co.uk
Chair of Trustees	Chris Bull	chrisbull@austinfriars.co.uk
<u>Cumberland Children's Advice and Support Service (CCASS)</u>		0333 240 1727
Cumberland Local authority designated officer (LADO)	Rebecca Wardlow	0300 303 3892 lado@cumberland.gov.uk (01768 812267)
Child Centred Policing Team (CCPT) Cumberland	Sam Wilkinson PC 1994	0300 124 0113 ext 41994 Samantha.Wilkinson@cumbria.police.uk
Family Help Support	Claire Murphy	0300 303 3896 early.help@cumbria.gov.uk
Marsh (Staff Support)		
Channel helpline		020 7340 7264 (or contact Police through 101)
Ofstead	Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD	0300 123 1231 (Monday to Friday from 8.00am to 6.00pm) enquiries@ofsted.gov.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
CME Officer		0300 373 3730 accessandinclusion@cumberland.gov.uk
Cumberland Elective Home Education Officer	Rachel Bryant	07780776456 ElectiveHomeEducation@cumberland.gov.uk
NSPCC Whistleblowing Advice Line		0800 028 0255 (8.00am to 8.00pm)
Disclosure and Barring Service	DBS Customer Services, PO Box 3961, Royal Wootton Bassett. SN4 4HF	03000 200 190 customerservices@dbb.gov.uk
Forced Marriage Unit		020 7008 0151 fmv@fco.gov.uk

Appendix 2: types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 penetration with an object) 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

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Appendix 3: safer recruitment and DBS checks – policy and procedures

Austin Friars School is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, governors, trustees and third-party providers to share this commitment. Safeguarding considerations are embedded at every stage of the recruitment process and all appointments are subject to satisfactory safer recruitment checks. Full policy can be found on the school website.

The following steps have been put 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 reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask 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 interview stage. The information we may ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
 - If they are known to the police and children's local authority social care and
 - If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also consider carrying 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

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and 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. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- 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
- Ensure at least one person involved in the recruitment process will have undertaken appropriate recruitment training.

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 recruitment decision taken
- Obtain a separate barred list check:

- For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
- Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- 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 for 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:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - 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.

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 on 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, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

Existing staff and volunteers

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

- There are concerns about an existing member of staff's or the volunteer'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

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

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, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

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 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.

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 allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- 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

- Obtain references for volunteers before recruited if working with EYFS
- 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

Trustees

All trustees 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 proprietors, trustees, local trustees 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

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 it is necessary for barred list checks to 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 prior to the visit.

Appendix 4: allegations of abuse made against staff

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, trainee 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 are in any doubt as to whether a concern meets the harm threshold, we will consult the Cumberland local authority designated officer (LADO) – full details can be found in appendix 1.

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 head, or the chair of trustees where the head 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

If in doubt, the case manager will seek views from the school's HR advisors and the LADO, as well as the police and CCASS where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that 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 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 LADO (and the police or CCASS, where necessary). Where the police and/or 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 local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. 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** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or Cumberland 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. The school is a member of Marsh to support staff and details can be found in appendix 1.
- 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 LADO, CCASS and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

As an EYFS provide, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made. (See appendix 1 for contact details)

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, trainee 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, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. 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, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

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 LADO 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 Cumberland 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 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 is in need of help, or the allegation may have been a cry for help, a referral to CCASS 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 is in need of help, or the allegation may have been a cry for help, a referral to CCASS 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 Cumberland children's social care services, as appropriate, to agree:

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations 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 practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

For all other cases, the case manager 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: (Low Level Concerns) - concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children

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

Sharing low-level concerns

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

We have created 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 as per section 4.7 of this policy and to do so as soon as possible, ideally within 24 hours of becoming aware of it.
- Empowering staff to self-refer if they have found themselves in a situation which may be misinterpreted and/or on reflection they have behaved in a way that may be considered to fall below the expected professional standard.
- Allowing staff to share their concerns verbally or through the Staff Safe on CPOMS. (If reported verbally the Head/DSL should record the information through CPOMS.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Ensuring staff know that confidentiality is paramount and only the Head and Deputy Head Pastoral have access to the low level concerns.

Responding to low-level concerns

Upon receipt of a concern, the Headteacher or DSL will respond as soon as is reasonably practicable (within 5 days). They will then:

1. Review the concern/s. This may include asking the reporter of the concern to provide any further information/ clarification.
2. Discuss the concern with the person against whom the concern is raised. Providing them the right to reply to the concern and informing them of any action that may subsequently be taken. Records of Low Level Concerns will be held confidentially.
3. Follow the relevant procedure which may include a referral to the LADO or steps taken to address unprofessional behaviour.

Record keeping

All low-level concerns will be recorded and stored securely through CPOMS and will only be accessed by Head and Deputy Head Pastoral (the Deputy DSL may access low-level concerns records if instructed by the DSL/Head). CPOMS allows low-level concern records to be kept centrally along with other safeguarding and child protection records, and within the staff personnel file.

The staff member(s) who reported the concern must keep the information confidential and not share the concern with any other person apart from the Head or the DSL.

In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action,

either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the LADO and Police is necessary – details found in appendix 1.

- Retained at least until the individual leaves employment at the school

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

References

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

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

Appendix 5: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

This section is based on part 1 of the Department of Science, Innovation and Technology and the UK Council of Internet Safety's [advice for education settings](#) .

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account

- Use digitally manipulated images, including AI-generated images, of the child or young person

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

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

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

Children who are absent or missing from education (CME)

A child being absent from education for prolonged periods and/or on repeat occasions 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 of becoming missing from education. 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 with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

If any pupil (including EYFS) is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternated emergency contacts.

We will consider pattern and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to CCASS and/or police welfare check requested.

The school is required to providing the local authority (CME officer details can be found in appendix 1) with the names and addresses of all pupils of compulsory school age who fail to attend school regularly or have been absent for a continuous period of 10 school days where their absence has been recorded as *unauthorised*.

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 CCASS, and the police, if the child is suffering or likely to suffer from harm, or 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. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's CCASS 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. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

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. Most sexual abuse is committed by individuals known to the victim.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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 (including harassment and violence)

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.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are 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 cyberbullying, 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)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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 making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, 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 nude or semi-nude 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 if a child makes a report to them, they will follow the procedures set out in section 4 of this policy, as appropriate. In particular, section 4.8 and 4.9 set out more detail 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 including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. 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 notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for [information sharing](#).

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

Homelessness

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

The DSL and DDSL's 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 in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority CCASS. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmufco.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 vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

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

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

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at 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 7.5 of this policy, including discussing their concerns with the DSL.

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

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB 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)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, 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 and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 4 of this policy, as appropriate. In particular, section 4.8 and 4.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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

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

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

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 are expected to sign the visitors' book and wear a visitor's lanyard.

Visitors to the school who are 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. (See appendix 9 for more on visiting speaker guidance)

Non-collection of children

Where a child has not been collected as expected, staff will take reasonable steps to contact the parent(s), carer(s) or emergency contacts recorded for the pupil. The child will remain under the supervision of suitable staff in a safe and secure environment whilst efforts are made to establish contact.

If the school is unable to make contact with a parent, carer or authorised collector, or if there are concerns about the child's welfare, the matter will be referred to the Designated Safeguarding Lead (DSL), Deputy DSL or a member of the Senior Management Team. A dynamic risk assessment will be undertaken, taking account of the child's age, vulnerabilities, SEND, medical needs and any known safeguarding concerns.

Where a child remains uncollected and all reasonable attempts to contact parents, carers and emergency contacts have been exhausted, the school will seek advice from Children's Social Care (CCASS) and/or the Police, as appropriate. A full written record of actions taken, decisions made and communications held will be maintained in CPOMS in accordance with the school's safeguarding and record-keeping procedures.

For EYFS pupils, the school will follow the requirements of the Early Years Foundation Stage framework. If a child is not collected and no contact can be made with the parent or authorised collector within a reasonable period, the school will continue to care for the child and seek advice from CCASS and/or the Police as appropriate. The child's welfare will remain paramount at all times.

Missing pupils

The welfare and safety of all pupils is paramount. Any unexplained absence of a pupil during the school day will be treated as a safeguarding concern and responded to immediately.

1. Initial Enquiries

Any member of staff who becomes aware that a pupil's whereabouts cannot be accounted for must make immediate enquiries to establish the pupil's location. This should include checking with Reception to confirm whether the pupil has signed out, been collected by a parent/carers, or is attending an authorised activity. Staff should also make reasonable enquiries with colleagues and pupils and, where appropriate, attempt to contact the pupil by telephone.

1. Notification to Senior Staff

If the pupil's whereabouts remain unknown following these initial enquiries (normally no longer than 15 minutes), the member of staff must immediately inform the Designated Safeguarding Lead (DSL), Deputy DSL, Head, or another member of the Senior Management Team.

2. Parental Contact and Risk Assessment

The DSL, Head, or nominated member of staff will contact the pupil's parent/carer to establish whether they have any information regarding the pupil's whereabouts. At the same time, a dynamic risk assessment will be undertaken, taking into account factors such as the pupil's age, vulnerability, medical needs, SEND, emotional wellbeing, known safeguarding concerns and any information indicating that they may be at risk of harm.

3. Search of the Premises

A coordinated search of the school site and other relevant locations will be undertaken without delay. Where considered necessary to support the search and ensure pupil safety, emergency evacuation procedures may be initiated so that all pupils and staff can be accounted for.

4. Police Involvement

If the pupil remains unaccounted for after a further 10 minutes, or sooner where the risk assessment indicates heightened concern, the DSL, Head, or nominated senior leader will contact the police. In situations where there is an immediate risk of significant harm, including concerns relating to self-harm, suicidal ideation, child criminal exploitation, child sexual exploitation, or other serious safeguarding concerns, the police will be contacted via 999. In other circumstances, a missing person report may be made via 101.

5. Ongoing Actions

School staff will continue to assist with searches, gather relevant information and support the police and other agencies as required until the pupil's whereabouts are established.

6. Recording and Follow-Up

All actions taken, decisions made and communications with parents/carers, the police and other agencies will be recorded on the pupil's safeguarding record. Upon the pupil's return, the DSL will consider whether further safeguarding action is required, including a welfare discussion, referral to external agencies, completion of a risk assessment, or liaison with the Missing Young Persons Team. The school will work with the pupil, family and relevant agencies to understand the reasons for the missing episode and reduce the likelihood of future occurrences.

Where a child repeatedly goes missing from education or from school, this may be a warning indicator of abuse, neglect, exploitation, child criminal exploitation (CCE), child sexual exploitation (CSE), mental health concerns, or other safeguarding risks. Such incidents will be reviewed by the DSL and managed in accordance with local safeguarding partnership procedures and this policy.

Appendix 6: Safeguarding EYFS – Specific Safeguarding Procedure Overview

1. EYFS Safeguarding Leadership

(DDSL) - EYFS	Abby Simpson	01228 550 722 abigailsimpson@austinfriars.co.uk
Designated safeguarding lead (DSL) and Deputy Head Pastoral	Claire Holmes	01228 550725 claireholmes@austinfriars.co.uk
Safeguarding mailbox	DDSL and DDSL team	safeguarding@austinfriars.co.uk
Head and Deputy DSL	Chris Hattam – (DDSL) - Head	01228 528042 Chrishattam@austinfriars.co.uk

It is the responsibility of EYFS safeguarding leads to:

- report concerns and allegations immediately.
- Arrangements for liaison with Children's Social Care, Cumberland Safeguarding Children Partnership, the LADO and Ofsted.
- Take responsibilities for ensuring compliance with all EYFS safeguarding and welfare requirements.

2. Staff-to-Child Ratios

Statutory EYFS ratios, including:

- Under 2 years: 1:3
- Two-year-olds: 1:5
- Three years and over: 1:8 (or 1:13 where a qualified teacher/EYPS is present)

3. Key Person System

Every EYFS child is allocated a Key Person who:

- Supports emotional wellbeing.
- Builds relationships with parents.
- Monitors welfare and development.
- Acts as a safeguarding point of contact where concerns arise.

4. Paediatric First Aid

- At least one person with a current full Paediatric First Aid qualification is present and available at all times in EYFS.
- A qualified person accompanies EYFS trips and outings.
- First aid qualifications are renewed as required.
- Snack and meal times are appropriately supervised.

5. Suitable People and Safer Recruitment

All EYFS staff recruitment of staff include:

- Enhanced DBS checks.
- Barred list checks where required.
- Written references.
- Suitability checks.
- Staff supervision arrangements.
- Procedures for volunteers.
- Duty to make DBS referrals where appropriate.

6. Managing Allegations and Low-Level Concerns

Any concerns relating to EYFS practitioners will be managed through the same safeguarding processes as the wider school

As a registered EYFS establishment the School has a responsibility to report any abuse to Ofsted within 14 days of awareness of an incident. Ofsted can be contacted in three ways.

1. Telephone: 0300 123 1231 (Monday to Friday from 8.00am to 6.00pm)
2. Email: enquiries@ofsted.gov.uk
3. Letter: Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD

8. Child Absence Procedures

- Expectations for parents to report absence.
- Monitoring of attendance patterns.

- Procedures for unexplained absence.
- Follow-up of prolonged absence.
- Consideration of safeguarding referrals where appropriate.

9. Online Safety in EYFS

KCSIE 2026 strengthens online safety expectations and the updated EYFS framework now requires providers to have regard to children's screen use.

Your policy should include:

- Age-appropriate online safety.
- Appropriate use of technology in EYFS.
- Filtering and monitoring arrangements.
- Responsible use of devices.
- Emerging technologies, including AI.
- Supervision of digital activities.

11. Intimate Care and Personal Care

Whilst this may sit within a separate policy, the safeguarding policy should reference:

- Safe changing procedures.
- Nappy changing arrangements.
- Maintaining dignity and privacy.
- Recording concerns arising during intimate care.

12. Staff Training Requirements

Your EYFS section should specify:

- Safeguarding training.
- Induction.
- Prevent duty awareness.
- Cyber security/online safety.
- Paediatric First Aid.
- Food hygiene.
- Ongoing safeguarding updates.

Your existing policy already references most of these.

13. Staff Behaviour and Conduct

The EYFS safeguarding section should reference:

- Staff Code of Conduct.
- Physical intervention.
- One-to-one working.
- Professional boundaries.
- Social media use.
- Appropriate touch.

14. Information Sharing and Record Keeping

Specific EYFS wording should include:

- CPOMS use.
- Confidential safeguarding records.
- Information sharing.
- Transfer of files.

- Record retention arrangements.
- There are 2 emergency contacts held by the school for each child

15. Ofsted Notification Requirements

Many schools omit this.

Your policy should state that the School will notify Ofsted of:

- Any serious safeguarding event.
- Allegations affecting suitability to work with children.
- Significant events affecting children's welfare.

16. Health, Safety and Welfare

A short EYFS safeguarding section should cover:

- Administering medication.
- Staff health.
- Smoking and vaping prohibition.
- Risk assessments.
- Accident recording.
- Supervision arrangements.
- Safe sleeping arrangements (where applicable).
- Safeguarding implications of allergies and medical conditions.

17. Missing Child and Collection Arrangements

Include:

- Collection procedures.
- Unexpected adult collections.
- Missing child procedures.
- Escalation routes.

18. Safeguarding Culture in EYFS

KCSIE and EYFS both emphasise culture.

A short section should explain:

- How children are encouraged to communicate concerns.
- How staff observe welfare indicators.
- The importance of secure attachments and trusted relationships.
- Partnership working with parents.
- Early identification and intervention.

Appendix 6: Safeguarding Pupils Aged 18 or over

Whilst the legal definition of a child ends at the age of 18, Austin Friars recognises that pupils who remain enrolled at the School after their eighteenth birthday continue to require appropriate safeguarding, pastoral care and welfare support. The School also recognises its continuing responsibility to safeguard younger pupils and maintain a safe environment for the whole school community.

In accordance with Keeping Children Safe in Education (KCSIE) 2026, all pupils enrolled at the School, regardless of age, remain subject to the School's safeguarding arrangements, expectations of behaviour, policies and procedures. The School seeks to balance the increased rights and autonomy of legal adults with its responsibility to protect all members of the school community.

Expectations and Safeguarding Responsibilities

All safeguarding policies and procedures apply equally to pupils aged 18 and over, including:

- Child-on-child abuse procedures
- Online safety and acceptable use of technology
- Anti-bullying procedures
- Behaviour and disciplinary procedures
- Preventing radicalisation and extremism (Prevent Duty)
- Low-level concerns and professional boundaries
- Sexual violence and sexual harassment procedures
- Attendance, welfare and pastoral support arrangements

Pupils aged 18 and over are expected to recognise that their status as legal adults does not exempt them from the School's safeguarding arrangements or diminish their responsibility to act as positive role models within the School community.

Some pupils aged 18 and over may remain vulnerable due to SEND, mental health difficulties, disability, illness, additional learning needs, being care experienced, being a young carer, or other circumstances. Such pupils may require enhanced pastoral support, risk assessment and safeguarding oversight.

Where a pupil aged 18 or over is identified as having care and support needs and may be experiencing, or at risk of, abuse or neglect, the DSL will consider whether the matter meets the threshold for referral under adult safeguarding procedures in accordance with the Care Act 2014. The School will seek advice from Cumberland Safeguarding Adults Board, Adult Social Care or other appropriate agencies where necessary. Staff should report concerns regarding any pupil, regardless of age, to the DSL without delay.

Relationships and Professional Boundaries

The School recognises that pupils who are 18 years of age or older are legal adults. However, where relationships develop between pupils aged 18 and over and younger pupils, the School will consider any safeguarding implications, power imbalances, issues of influence, coercion, exploitation or inappropriate behaviour on a case-by-case basis.

Any concerns regarding sexual behaviour, grooming, coercion, exploitation, abuse of trust, inappropriate communications or breaches of professional boundaries will be referred immediately to the DSL and addressed in accordance with safeguarding procedures.

Accommodation, Facilities and Supervision

When allocating accommodation, changing facilities, sleeping arrangements during educational visits or other school activities, the School will take account of:

- Age and maturity;
- Vulnerability and additional needs;
- Safeguarding concerns or previous behavioural issues;
- Appropriate privacy and dignity considerations;
- The safety and wellbeing of younger pupils.

Pupils aged 18 and over will not routinely share overnight accommodation with younger pupils unless a specific risk assessment has been undertaken and approved by the School.

School staff will continue to provide appropriate supervision and pastoral oversight whilst recognising the increased independence and responsibility expected of older pupils.

Where a pupil aged 18 or over is living with a guardian, host family or independently arranged accommodation, the School will continue to maintain appropriate welfare oversight and respond to any safeguarding concerns in accordance with its safeguarding procedures.

Online Safety

Pupils aged 18 and over remain subject to the School's Online Safety Policy, Acceptable Use Agreements and filtering and monitoring systems. The School will act upon concerns relating to online abuse, harassment, exploitation, inappropriate communications, image sharing, cyberbullying or any behaviour that presents a safeguarding risk to other pupils.

Information Sharing and Consent

The School recognises that pupils aged 18 and over have additional legal rights in relation to privacy, consent and personal information.

However, where safeguarding concerns arise, the School may share information without consent where permitted or required by law, particularly where:

- A pupil or another person is at risk of harm;
- A younger pupil may be at risk;
- A criminal offence may have been committed;
- The School has a safeguarding duty to disclose information to external agencies.

Where a pupil is aged 18 or over, they are ordinarily responsible for decisions regarding their own medical treatment, health information and consent. The School will encourage appropriate communication with parents and guardians but will respect the legal rights of the pupil unless safeguarding concerns or emergency circumstances require otherwise.

Safeguarding Concerns, Response and Support

Any safeguarding concern involving a pupil aged 18 or over, whether as the person at risk, an alleged perpetrator, witness or person of concern, will be managed through the School's safeguarding procedures. Concerns will be:

- Reported promptly to the DSL;
- Recorded in accordance with the School's safeguarding procedures;
- Risk assessed as appropriate;
- Referred to external agencies where necessary;
- Managed with appropriate pastoral support and intervention.

The School will consider both the welfare needs of the individual pupil and the safety of the wider school community, particularly where younger pupils may be affected.

Allegations, concerns or reports involving an adult pupil that indicate a risk to younger pupils or other members of the school community will be managed through the School's safeguarding procedures and may involve multi-agency working, police consultation or referral to external safeguarding agencies as appropriate.

In all cases, Austin Friars will seek to uphold its Augustinian values of **Truth, Love and Unity**, while ensuring that safeguarding remains the paramount consideration.

Appendix 8 – The School's Records Retention Schedule

Record Creation and Maintenance

All safeguarding concerns, disclosures, discussions, decisions, referrals and actions taken must be recorded promptly on CPOMS by the member of staff concerned and reviewed by the Designated Safeguarding Lead (DSL) or Deputy DSL as appropriate. Records must be factual, accurate, contemporaneous and distinguish clearly between fact, opinion and professional judgement.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of any conversations with the child, parent or other agencies.
- Actions taken and by whom.
- Decisions reached and the rationale for those decisions.
- Referrals made to Children's Social Care, the Police, the Prevent programme or other agencies.
- Outcomes, review arrangements and follow-up actions.
- Any supporting documentation, correspondence or chronologies.

All safeguarding records are maintained electronically through CPOMS. Any paper records received will be scanned and uploaded where appropriate, with originals stored securely in locked safeguarding files.

Transfer of Safeguarding Records

Where a pupil transfers to another school or college, the DSL will ensure that the safeguarding file is transferred securely and separately from the main educational record.

In accordance with Keeping Children Safe in Education:

- For an in-year transfer, child protection files will be transferred within **five school days** of the pupil leaving Austin Friars.
- For pupils transferring at the end of an academic year, files will be transferred within the **first five school days of the new term**.
- Receipt of records will be confirmed by the receiving school.
- Where concerns are significant, complex or involve multi-agency intervention, the DSL will speak directly with the receiving DSL in addition to transferring the written records.
- A record of the transfer date, recipient, method of transfer and confirmation of receipt will be retained by the School.

The School will retain its original safeguarding archive in accordance with this retention schedule.

Record Retention Schedule

PUPIL RECORDS

Document type	Retention period	Action at end of retention period	Guidance/legislation
Primary school pupil records	Until the pupil leaves the school. You should keep the pupil's data on your MIS for 2 terms after the pupil leaves the school. See the schools census guidance for details on reporting data after pupils leave.	Transfer to secondary school or other primary school when the pupil leaves.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the record, and DfE guidance on how to transfer information to another school.
Secondary school pupil records (inc. Early Help with no escalation)	Until the pupil's 25th birthday.	Dispose of records securely. If the pupil leaves to go to another school, transfer the records to that school.	See The Education (Pupil Information) (England) Regulations 2005 for details of what to keep in the record. Retain as detailed in section 2 of the Limitation Act 1980 . See guidance on what to do if your school will close before the end of the retention period.

CP RECORDS

Document type	Retention period	Action at end of retention period	Guidance/legislation
Child protection files (inc. Operation Encompass)	Until the child's 25th birthday. If the file relates to child sexual abuse, retain until the child's 75th birthday.	Dispose of records securely. Child protection files should be passed on to any new school a child attends (transferred separately from the main pupil file).	Store either as a separate file or in a sealed envelope in the pupil file. Keeping Children Safe in Education sections 122 and 123. The Report of the Independent Inquiry into Child Sexual Abuse (IICSA), recommendation on access to records .
Allegations of child protection against a member of staff,	Until the staff member's normal retirement age, or 10 years from the date of	Dispose of records securely.	Keeping Children Safe in Education and Working together to safeguard children .

including unfounded allegations	the allegation, whichever is later.		
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In addition:

- Appendix 3 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Review of Archived Safeguarding Records

The DSL will undertake periodic reviews of archived safeguarding records to determine whether there remains a lawful and necessary reason for retention. Records subject to ongoing:

- safeguarding investigations;
- complaints;
- legal proceedings;
- insurance claims;
- serious incident reviews;
- disciplinary proceedings; or
- statutory enquiries

will not be destroyed until all matters have concluded, regardless of the retention periods specified above.

Secure Storage

Safeguarding records will be:

- Stored on secure, encrypted systems with role-based access controls.
- Accessible only to DSLs and authorised senior leaders.
- Protected from unauthorised access, alteration, disclosure or deletion.
- Backed up in accordance with the School's information security procedures.
- Stored separately from general pupil records where appropriate.

Secure Destruction

At the end of the retention period, records identified for disposal will be reviewed and authorised by the DSL.

Paper records will be cross-shredded or destroyed through a confidential waste contractor.

Electronic records will be permanently deleted from all live and archived systems, including backups where practicable.

A record of destruction will be maintained.

All safeguarding records are maintained on CPOMS, which serves as the School's primary safeguarding recording system. Any significant safeguarding concerns are subject to regular DSL oversight and chronology review to identify patterns, emerging risks and the effectiveness of interventions.

Appendix 9: Guidance for visiting Speakers

The School recognises the value that external speakers can bring to pupils' education while maintaining its duty to protect pupils from harm, radicalisation, inappropriate influence, discrimination, misinformation and extremist views. All speakers must be approved and appropriately checked before the visit, with a Visiting Speaker Risk Assessment completed and suitable staff supervision maintained throughout. Concerns must be referred immediately to the DSL and managed in accordance with this policy and local safeguarding procedures. Please refer to the School's Visiting Speaker Policy for full details

VISITING SPEAKER RISK ASSESSMENT / CHECKLIST



Event Details

Item	Details
Name of organising member of staff	
Name of visiting speaker	
Organisation of Speaker	
Contact details	
Date of visit	
Time of visit	
Location	
Audience (age/year groups)	
Number attending	

Speaker Information

Check list	Yes/No	Details as necessary
Has an outline of the presentation been obtained?		
Have any presentation materials been reviewed where appropriate?		
Has internet-based due diligence been conducted?		
Are there any safeguarding concerns regarding the speaker or organisation?		
Are there any Prevent concerns identified?		
Are there any equality or discrimination concerns identified?		
Is the content considered age appropriate?		
Is the content compatible with School values and British Values?		

If concerns are identified, refer immediately to the DSL before approval is given.

Safeguarding Arrangements

Question	Yes/No	Details as necessary
Will a member of staff supervise throughout the event?		
Has the Visiting Speaker Policy been sent to the speaker?		
Has the speaker agreed to comply with safeguarding expectations?		
Has the speaker confirmed no private communication or personal contact with pupils will take place?		
Are any sensitive or potentially traumatic topics being discussed?		
Have appropriate warnings or support arrangements been considered?		

DBS Considerations

Question	Yes/No	
Will the speaker be undertaking regulated activity?		
Will the speaker have unsupervised access to pupils?		

If "Yes" to either question, consult the DSL before the visit.

DBS Number (if applicable): _____

Date Issued: _____

Approval

Name of Supervising Staff

Member: _____

I confirm that the appropriate checks have been completed and that this visit complies with the School's Visiting Speakers Policy.

Signed: _____

Date: _____

Authorisation

Deputy Head (Pastoral) / Head of Junior School / Headmaster

Signed: _____

Date: _____

A copy of this form needs to go to HR to be recorded in the visiting speaker register.