St Gabriel the Archangel Catholic Multi-Academy Trust

# Safeguarding Policy

# HOLY NAME CATHOLIC PRIMARY SCHOOL

TO BE REVIEWED FOLLOWING ANY LEGISLATIVE CHANGES

FOR ALL ACADEMIES PART OF ST GABRIEL THE ARCHANGEL CATHOLIC MULTI-ACADEMY

Approved by Local Governing Body: **21.09.26**

Next Review: **21.09.27**

This policy is available on our academy website, and is available on request from the academy office. We also inform parents and carers about this policy when their children join our academy and through newsletters.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance Keeping Children Safe In Education 2026. To underpin the values and ethos of our Catholic multi academy trust and our intent to ensure that pupils at our academy are appropriately safeguarded, the following policies are also included under our safeguarding umbrella:

Anti-Bullying
Attendance Policy
Behaviour Policy
Child-on-Child Abuse Policy
RSE/PSHE Policy
Educational visits
Equality Policy
Health and Safety including Site Security
Supporting Students with Medical Needs Policy
Online safety – IT Code Of Conduct
Safer Recruitment & Selection Policy
Staff Code of Conduct
Preventing Extremism & Radicalisation Policy
Early Years Foundation Stage Policy
Whistleblowing Policy

# Contents


**Archdiocese of Birmingham Diocesan Education Service Protocol 4: Safeguarding** **5**

**St Gabriel the Archangel Catholic Multi Academy Trust Safeguarding Statement** **6**

Safe Recruitment Of Staff And Volunteers 7

CMAT Responsibilities 8

Training 9

**Key Contact Information** **11**

**Introduction** **13**

Aims and purpose 14

Ethos and Values 14

Legislation and Guidance 15

Related Policies 16

**Context** **17**

Contextual Issues 17

Culture of Safeguarding 18

Local Arrangements 19

Local Authorities Within St Gabriel the Archangel CMAT 19

Roles and Responsibilities 19

Roles and Responsibilities: Executive Board of Directors 19

Roles and Responsibilities - Designated and deputy safeguarding lead/s 26

Understanding the views of children 29

Roles and Responsibilities - All staff 29

Roles and Responsibilities - Supply staff, volunteers, and students 30

Parental Responsibilities 31

Children's Responsibilities 31

Confidentiality and Information sharing 31

Advice for all staff, supply staff and volunteers - What to do if a child discloses 32

Our reporting and recording procedures 33

Early Help 34

Making a referral to children's social care 35

Making a referral 36

Voice of the child – (children's wishes) 36

Record Keeping 36

Looked After Children and Previously Looked After Children 37

Care Leavers 37

Children With Special Educational Needs, Disabilities, Or Health Issues 37

Children Who Are Lesbian, Gay, Bi Or Trans (LGBT) 38

Safeguarding Training 38

Staff Training 38

Safer Recruitment Training 39

Safer working practices 39

Safer Recruitment 39

Safeguarding Concerns And Allegations Made About Staff, Including Supply Teachers, Volunteers And Contractors 42

Whistleblowing 44

Curriculum and Online Safety 45

Online Safety curriculum and computing, use of mobile technology 46

Consensual and non-consensual sharing of images 47

Prevent (Preventing Radicalisation) 48
Channel 49
Cybercrime 49
Types And Indicators Of Abuse And Neglect 49
Contextual Safeguarding 50
Child Sexual Exploitation (CSE) 51
Child Criminal Exploitation (CCE) and County Lines 52
County Lines 52
Child-on-Child Abuse 53
Child-On-Child Sexual Violence And Harassment 55
Domestic Abuse 57
Operation Encompass 58
Children Absent from Education 58
Private Fostering Arrangements 59
'Honour-based Abuse' 59
Female Genital Mutilation (FGM) 60
Forced Marriage 60
Breast Ironing/Flattening 60
Up-Skirting 61
Serious Violence 61
Children And The Court System 61
Children With Family Members In Prison 62
Mental Health 62
Homelessness 63
Modern slavery and the National Referral Mechanism 63
Child Abduction And Community Safety Incidents 63
Monitoring Policy And Practice 64
**Appendix A Actions if there is a concern about a child (KCSIE 2026) 65**
**Appendix B Flow chart for raising safeguarding concerns about a child 66**
**Appendix C Police and Criminal Evidence Act (1984) – Code C: 67**
**Appendix D Seven Golden Rules Of Information Sharing 69**
**Appendix E Further Advice On Child Protection Is Available On: 71**
**Appendix F Protocol For External Speakers Or Organisations 72**
**Appendix G Safeguarding Email Template For All Staff 74**
**Appendix H Safeguarding Reporting And Accountability Structure 2025-26 76**

Throughout this policy the terms 'school' and 'academy' are interchangeable

# Archdiocese of Birmingham Diocesan Education Service Protocol 4: Safeguarding

**Key Principles:**

• In accordance with the relevant statutory requirements, certain pre-employment checks must be conducted for positions that involve work with vulnerable groups, specifically children and vulnerable adults.

• Statutory and other appropriate safeguarding training should be attended by members of governing boards and school staff.

• In addition to pre-employment checks, governing boards must also ensure that statutory and other appropriate safeguarding policies are in place to ensure that daily safeguarding processes protect pupils.

**Diocesan Protocols on Safeguarding:**

**Protocol 4.1** Governing boards must follow any guidance on safeguarding issued by the Diocese.

**Protocol 4.2** Boards of Directors of Academy Trust Companies are required to determine who will be responsible for safeguarding in their academy in line with their Scheme of Delegation.

**Protocol 4.3** Governing boards must ensure that the Director of Education is informed of any significant safeguarding issue that arises, if there is any doubt as to whether an issue is significant, governing boards should contact the Director of Education.

# St Gabriel the Archangel Catholic Multi Academy Trust Safeguarding Statement

St Gabriel the Archangel Catholic Multi Academy Trust is the proprietor as defined above and as such is responsible for ensuring that all staff in the CMAT academy read 'Keeping Children Safe in Education 2026 - Statutory Guidance for Schools and Colleges'. KCSIE 2026 This legal requirement together with the Catholic values and principles that underpin the St Gabriel the Archangel Catholic Multi-Academy Trust mean that it is essential that the CMAT ensures not only compliance at local level, but also assumes a strategic responsibility to ensure that safeguarding practices are robust and effective in safeguarding and protecting the welfare of all children and young people in its care.

St Gabriel the Archangel Multi Academy Trust as the proprietor and all our Local Governing Bodies are aware of our obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and our local multi-agency safeguarding arrangements. Local Authorities have overarching statutory responsibility for safeguarding and promoting the welfare of all children and young people in their area. However, safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action. This is defined in our Safeguarding Policy, ensuring a culture of safeguarding in all that we do.

Keeping Children Safe in Education - Statutory Guidance for Schools and Colleges 2026 defines Safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- 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.

'Children' includes everyone under the age of 18. Safeguarding also encompasses issues such as health and safety, bullying, and a range of other issues, for example, arrangements for meeting the medical needs of children by providing first aid, academy security, drugs and substance misuse and positive behaviour. There may also be other safeguarding issues that are specific to the local area or population highlighted within the Safeguarding Policy for each academy through contextual safeguarding areas of risk. St Gabriel the Archangel Catholic Multi-Academy Trust is wholly committed to ensuring that all children and young people are cared for in a safe, nurturing and secure environment in our academy.

To fulfil this commitment, we have robust systems in place for:

- Policy and procedures
- Safe recruitment of staff and volunteers

- CMAT responsibilities
- Training policy and procedure

Child Protection/Safeguarding policies must be reviewed and agreed on an annual basis to ensure that key messages from legislation and guidance are embedded within all of our academy. Policy and procedures are developed using Keeping Children Safe in Education (September 2026) and Working Together to Safeguard Children (2026) and other key government guidance. St Gabriel the Archangel Catholic Multi-Academy Trust will follow clear policies for dealing with allegations against people who work with children. There is a clear Whistleblowing Policy in place. Additional support and challenge is made to ensure that other safeguarding policies and procedures are effective such as E-Safety, Anti-Bullying, Codes of Conduct, Pupil Behaviour and Attendance. St Gabriel the Archangel Catholic Multi-Academy Trust expects that each academy will follow the guidance and child protection procedures provided by their Local Safeguarding Children Board and Local Authority children's services departments.

## Safe Recruitment of Staff and Volunteers

Safer recruitment is an important part of safeguarding children and is the first step to safeguarding and promoting the welfare of children in education. St Gabriel the Archangel Catholic Multi-Academy Trust and Holy Name Catholic Primary School sees it as vital that there is a culture of safe recruitment and has adopted recruitment procedures that will deter, reject and identify people who might be unsuitable to work with children and young people.

All elements of our Safer Recruitment Policy ensure that the recruitment and selection processes outlined:

- meet the requirements of Keeping Children Safe in Education (September 2026) and are robust.
- have relevant vetting and checking procedures
- include a robust induction
- provide an ongoing training infrastructure

The policy outlines the steps that INSERT SCHOOL NAME will take to ensure those employed in our academy are safe to work with children and young people and its main purpose is:

- to prevent unsuitable people working within our academy
- to attract the best possible candidates to work in our academy
- to create and maintain a safe workforce

St Gabriel the Archangel Catholic Multi-Academy Trust will provide clear guidance, expectations, challenge, and support to all academies to maintain a single central record to provide reassurance that all staff and volunteers are recruited safely.

## Holy Name Catholic Primary School Responsibilities

Holy Name Catholic Primary School is committed to the following core safeguarding principles within our academy:

- A designated safeguarding lead and a deputy designated safeguarding lead
- Holy Name Catholic Primary School's responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
    - We recognise that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
    - We ensure extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.
- Children who are safe and feel safe are better equipped to learn.
- A culture of listening to children and take account of their wishes and feelings.
- Holy Name Catholic Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, trainee teachers, governors and directors to share this commitment.
- All staff, volunteers, trainee teachers, governors and directors have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in our academy.
- Arrangements for working together with other agencies and for sharing information with other professionals.
- If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care immediately.
- All staff members will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members are to always act in the interests of the child.
- Child-on-child abuse, sexual violence and sexual harassment will be met with an immediate response by Holy Name Catholic Primary School
- Pupils and staff involved in child protection issues will receive appropriate support.
- Policies and procedures are in place for reporting allegations made against or concerns raised in relation to teachers, including supply teachers, other staff, trainee teachers, volunteers or contractors.
- Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.
- Implement appropriate safeguarding responses to children who go missing from education.
- Fulfil all of their statutory responsibilities in respect of safeguarding and promoting the welfare of children.

## Training

Holy Name Catholic Primary School will ensure that all staff comply with training requirements as defined in Keeping Children Safe in Education (September 2026):

- All staff must undergo safeguarding and child protection training at induction. This training should be updated regularly. It should also be in line with advice from the local safeguarding children board (LSCB).
    - SCSP – Sandwell Children's Safeguarding Partnership.

- Safeguarding training during induction should give staff an awareness of the Aacademy's safeguarding systems.
- 
- Induction training should also cover:
    - The Safeguarding Policy
    - The staff code of conduct (training should cover whistleblowing procedures)
    - The role of the designated safeguarding lead (DSL)

- The DSL and any deputy DSLs within our academy should undergo training that provides them with the knowledge and skills needed to perform the role. This training should be updated every two years.
- DSLs should undertake training on the government's anti-radicalisation strategy, PREVENT. All staff, volunteers, trainee teachers and governors receive PREVENT training.
- The knowledge and skills of the DSL and deputies should be updated 'at regular intervals.'
- Safer recruitment training is completed for required staff, governors and directors.
- Our academy are additionally required to ensure all staff, volunteers, trainee teachers and governors have opportunities to explore learning in relation to female genital mutilation, honour-based violence, other local and national priorities, managing allegations and E-safety
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities as part of a broad and balanced curriculum.
- Appoint a designated teacher to promote the educational achievement of children who are looked after and ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

Holy Name Catholic Primary School will also:

- Monitor the quality of safeguarding practices and their impact on outcomes for children and provide regular reports to the Local Governing Body
- Work with the Local Governing Body to ensure that the performance of vulnerable children is effectively monitored and that appropriate support is made available to those children who are at risk of achieving poor outcomes because they are a child in need, subject to child protection plans or who are looked after.
- Liaise with local authority lead professionals for safeguarding, Safeguarding Children's Partnerships and other agencies as required.
- Produce an annual safeguarding action plan as part of the academy's strategic business planning arrangements.
- Commission external challenge and support where appropriate to ensure we meet our statutory responsibilities in respect of safeguarding and promoting the welfare of children.

Policy, in respect of safeguarding, is determined primarily at national and local authority level and it is the responsibility of Holy Name Catholic Primary School to implement such policy.

Holy Name Catholic Primary School is committed to ensuring adherence to national and local policy in the interests of vulnerable children and young people. Failure to implement appropriate arrangements in our academy to safeguard and promote the well-being of children carries significant reputational risk for the CMAT. Keeping Children Safe in Education (2026); 'The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children' (paragraph 120). 'DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.' (paragraph 119). 'This includes allowing practitioners to share information without consent.' (paragraph 77)

# Key Contact Information

| Role/Agency | Name | Phone | E-mail |
|---|---|---|---|
| **St Gabriel the Archangel CMAT Key Contacts** | | | |
| SGtACMAT CEO | Toni Ellis | | tellis@sgacmat.co.uk |
| Regional CSEL Stoke and Newcastle-Under-Lyme | Ian Beardmore | | ibeardmore@sgacmat.co.uk |
| Regional CSEL Staffordshire | Margaret Yates | | myates@sgacmat.co.uk |
| Regional CSEL Wolverhampton and Black Country | Helen Parkes | | hparkes@sgacmat.co.uk |
| SGtACMAT Safeguarding Lead | Jamie Stubbs | | jstubbs@sgacmat.co.uk |

| Local Authority Key Contacts | | | |
|---|---|---|---|
| **Birmingham Designated Officer (LADO)** | LADO Administration Team | 0121 6751669 | ladoteam@birminghamchildrenstrust.co.uk |
| **Birmingham Education Safeguarding Officer** | Razia Butt<br>Angela James<br>Denise Mills | | Razia.butt@birmingham.gov.uk<br>angela.james@birmingham.gov.uk<br>denise.mills@birmingham.gov.uk |

| | | | |
|---|---|---|---|
| **Sandwell Designated Officer (LADO)** | Michelle Pinnock-Ouma | 0121 5694770 | Sandwell_lado@sandwellchildrenstrust.org |
| **Sandwell Education Safeguarding Officer:** | Sandwell Safeguarding Team | 0121 5693100 | |
| **Sandwell MASH 24 / EDT** | | 0121 569 3100 | |
| **Local Authority Child Protection Officers for Education** | Lisa Harvey<br>Beverley Need<br>Louise Atkinson<br>Jemma Jones | 07747118729<br>07775360203<br>07341795787<br>07393009664 | |
| **Sandwell LA PREVENT Education Officer** | Justin Nixon | 07790396643 | |

| | | | |
|---|---|---|---|
| **West Bromwich Central Strengthening Families Team** | | 0121 569 7293 | |
| **National Counter Terrorism Helpline** | | 0800 789 321 | counter.extremism@education.gov |
| **FGM** | Police | 101 or 999 | |
| **West Midlands Police** | Police | 101 Option 3 for WMP or 999 | |
| **NSPCC Whistleblowing helpline -** | NSPCC | 0800 028 0285 | help@nspcc.org.uk |
| **NSPCC Helpline** | NSPCC | 0808 800 5000 | help@nspcc.org.uk |

| | | | |
|---|---|---|---|
| **Walsall Designated Officer (LADO)** | Belinda Crowshaw Jaspal Tattar | 01922 652322 | lado@walsall.gov.uk |
| **Walsall Education Safeguarding Officer:** | MASH | 0300 555 2866 | safeguardingbusinessunit@walsall.gov.uk |

| HOLY NAME CATHOLIC PRIMARY SCHOOL | | | |
|---|---|---|---|
| **Role/Agency** | **Name** | **Phone** | **E-mail** |
| Headteacher / DSL | Andrew Neenan | 0121 357 3216 | andrew.neenan@holyname.sandwell.sch.uk |
| Deputy DSL/s | Esmie Chapman (DHT) | 0121 357 3216 | esmie.chapman@holyname.sandwell.sch.uk |
| | Keira Edmunds (AHT) | 0121 357 3216 | keira.edmunds@holyname.sandwell.sch.uk |
| | Lucy Kavanagh (AHT) | 0121 357 3216 | lucy.kavanagh@holyname.sandwell.sch.uk |
| Chair of Governors / Safeguarding Link Governor | Jayne Logue | 0121 357 3216 | jayne.logue@holyname.sandwell.sch.uk |
| Designated Teacher (DT) | Andrew Neenan | 0121 357 3216 | andrew.neenan@holyname.sandwell.sch.uk |
| Online Safety Lead | Esmie Chapman | 0121 357 3216 | esmie.chapman@holyname.sandwell.sch.uk |
| Virtual School Headteacher | Andrew Neenan | 0121 357 3216 | andrew.neenan@holyname.sandwell.sch.uk |

# Introduction

This document is the Safeguarding Policy for Holy Name Catholic Primary School.

Holy Name Catholic Primary School's Local Governing Body acknowledges its moral and statutory duty to safeguard and promote the welfare of all pupils. Together, we are committed to creating a safe and welcoming environment where every child and adult is respected and valued. The Local Governing Body adopt a 'whole school' approach to safeguarding, ensuring it is integrated into all aspects of our processes and policies. This commitment means that child protection is central to everything we do, with all systems, processes, and policies designed to operate with the best interests of the child at heart. We are dedicated to ensuring equal protection for all children and young people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. Our mission, guided by the principles of Catholic Social Teaching, is to act in the best interests of children, ensuring their safety and providing them with full access to education. In line with the UN Convention on the Rights of the Child, we recognise that all adults, in any capacity, are duty-bearers, accountable for ensuring that children experience their rights.

It is crucial that everyone working in Holy Name Catholic Primary School understands their safeguarding responsibilities.

This policy applies to all staff (teaching and non-teaching), members, directors, governors, employees, contractors, trainee teachers and volunteers, temporary and supply/visiting staff working in the trust.

It will be reviewed annually by the academy and the Trust, and is in line with the expectations of Ofsted/CSI which inspects safeguarding arrangements as part of the school's Leadership and Management, and the requirements of the Local Multi Agency Safeguarding Arrangements.

This Safeguarding Policy forms one part of our safeguarding responsibilities and the principles embedded in this policy should have due regard to a range of linked policies, including but not limited to: Safer Recruitment, Information Sharing and Record Keeping, Behaviour, Restrictive Intervention, Anti-Bullying, Mobile Phone Usage, Health and Safety, PSHE, Sex and Relationship Education, Equal Opportunities, Special Educational Needs, Confidentiality, Attendance, Substance Misuse (including drugs and alcohol), Racism and Homophobia, Educational visits, E-safety, Combating Extremism, School Security, Staff Code of Conduct, Managing Low-Level Concerns, Acceptable Use of Technologies and any other relevant policies as defined by statutory guidance, the Archdiocese of Birmingham Diocesan Education Service, and the Trust.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding and promoting the welfare of children is everyone's responsibility. All those who come into contact with children and their families have a role to play in keeping children safe.

In order to fulfil this responsibility effectively Holy Name Catholic Primary School will ensure their approach is child-centred and have the best interests of the child at the heart of all action.

We will follow the procedures agreed by our LA Children's Safeguarding Partnership. Mechanisms will be in place to help staff comprehend and fulfil their roles and responsibilities as outlined in Part One of KCSIE 2026. The Local Governing Body remain vigilant to the signs of abuse, neglect and exploitation, following established procedures to ensure effective support, protection, and justice for children and adults. We recognise the unique needs and potential

barriers faced by children from minority ethnic groups and those with disabilities, especially in communication. Child protection is a fundamental component of our schools' safeguarding responsibilities, ensuring that every child is protected and able to thrive in a safe educational environment.

## Aims and purpose

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across Holy Name Catholic Primary School
- To demonstrate our commitment to protecting and supporting our vulnerable children, children who need support through early help, children in need and children who have a child protection plan.

## Ethos and Values

Our core values are inspired by Catholic Social Teaching and are rooted in the person and teaching of Jesus Christ as the model for human excellence.

Our relationships and daily dealings with each other should be characterised by:

- Care for each other
- Compassion
- Trust and respect for the dignity and value of each individual
- Stewardship of the earth
- Solidarity and subsidiarity: a commitment to stand with each other in support of each other, while enhancing the culture, identity and heritage of each parish and local community.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We understand that safeguarding and promoting the welfare of children is everyone's responsibility and everyone who encounters our children and families has a role to play in identifying concerns, sharing information, and taking prompt action at the earliest opportunity.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

***We maintain an attitude of "it could happen here" where safeguarding is concerned.***

Safeguarding is what we do for all children and young people to keep them safe whilst in our care. Child protection describes the policy and procedures specifically for those young people who are at risk of serious harm or have been seriously harmed.

Holy Name Catholic Primary School is committed to safeguarding children and young people, and we expect everyone who works in our Trust to share this commitment.

Adults in our academy take all welfare concerns seriously and encourage children and young people to talk to us about anything that may worry them.

**Victims And Alleged Perpetrator(s)**

For the purposes of this policy, we, in places, use the term 'victim'. It is a widely recognised and understood term. It is important that we recognise that not everyone who has been

subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, we will be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

For this policy, we, in places, use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. These are widely used and recognised; however, we will think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

## Legislation and Guidance

Holy Name Catholic Primary School recognises and is committed to fulfilling its statutory responsibility to safeguard and promote the welfare of children in accordance with the following legislation and guidance:

- The Education Act 2002 (section 175/157)
- Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to plan to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academy and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.
- The Education (Independent School Standards) Regulations 2014
- The non-maintained Special Schools (England) Regulations 2015
- Local authority multi-agency safeguarding arrangements
- Local Safeguarding Children Partnership (LSCP) Multi-Agency Threshold Frameworks (2026 Updates)
- Restrictive Interventions, Including Use Of Reasonable Force, In Schools (2026)
- Working Together to Safeguard Children (2026)
- Keeping Children Safe in Education (September 2026)
- Generative Artificial Intelligence in Education (updated 2026)
- UKCIS/DfE Guidance on Responding To Child Sexual Abuse Material (CSAM) and Online Harm (2026)
- Information Sharing - Advice For Practitioners Providing Safeguarding Services To Children, Young People, Parents, And Carers (May 2024)
- What To Do If You Are Worried A Child Is Being Abused (March 2015)
- Sections 26 & 29 of the Counterterrorism and Security Act 2015
- Prevent Duty Guidance – England and Wales (December 2023)
- Working together to improve school attendance (August 2024)
- Section 5B of the Female Genital Mutilation Act 2003
- Terrorism (Protection of Premises) Act (Martyn's Law)
- KCSIE (Statutory Guidance on Gender Questioning Children Framework)
- The Equality Act 2010 & Human Rights Act 1998 (as applied to Educational Protective Provisions)
- Children Act 1989 & 2004
- Disqualification under the Childcare Act 2006 (July 2018 Regulations)

## Related Policies

Our policy relates to safeguarding and child protection concerns and sits within a suite of other safeguarding policies. Our policy applies to all staff (teaching and non-teaching), directors, governors and volunteers, trainee teachers, temporary and supply staff working in our

academy. It will be reviewed at least annually by the academy and the Trust, and is in line with our local safeguarding procedures, the expectations of the Department for Education and Ofsted which inspects schools' safeguarding arrangements.

Other policies that may be referred to within this policy include:

- Attendance and Punctuality
- Admissions
- Anti-Bullying
- Educational Visits
- Code of Conduct
- Safer Recruitment
- Behaviour Policy (Including physical intervention)
- Management of Allegations
- Online Safety
- Whistleblowing
- Intimate Care

# Context

Holy Name Catholic Primary School provides a universal service to children in our locality. School staff are closely involved, daily, with children and their families. Consequently, we have a critically important role towards the identification and prevention of harm, abuse, neglect or exploitation. This policy does not reiterate extensive sections of statutory guidance. It is a practical document that clarifies the roles and duties of all adults working in our schools and school communities. It should be used in conjunction with Keeping Children Safe in Education (KCSIE 2026) and with related school and Trust policies.

## Contextual Issues

| **Potential Contextual Safeguarding areas of risk**<br><br>**Each school has a separate contextual area of risk and mitigation.** | |
|---|---|
| **Area of Risk** | **Mitigation** |
| Examples (non-exhaustive list)<br><br>• child-on-child and relationship abuse.<br><br>•Criminal/ sexual exploitation/ online abuse.<br><br>• missing episodes.<br><br>• risks associated with gangs.<br><br>• risks associated with radicalisation.<br><br>• safeguarding risks in public spaces.<br><br>• trafficking and modern slavery.<br><br>• harmful sexual behaviour2<br><br>• extra-familial harm in schools<br><br>• AI Generate Imagery | • Some examples (non-exhaustive list)<br>• School ensures a safe and supportive environment<br>• School assess the risks that young people may be exposed to outside their school or college, as well as inside it by parent and pupil voice, liaising with local agencies.<br>• There is a culture where pupils can speak out or share any concerns with staff<br>• School conducts 'safety mapping' with pupils, where school helps them to identify safe adults that they could turn to when they feel vulnerable outside their school or college.<br>• When completing social care assessments, Keeping Children Safe in Education guidance advises that we provide as much information as possible on wider environmental factors, so that all available evidence and contexts of abuse can be considered.<br>• Workshops and leaflets to increase awareness for parents and those in our local community about how to recognise signs of neglect, abuse or exploitation, how young people can stay safe online and offline, and who to contact if they notice any warning signals. |

## Culture of Safeguarding

| | |
|---|---|
| Ensuring a culture of safeguarding is a priority for our academy. We do this by: | |
| Our staff create a culture of vigilance and continuously communicate the importance of safeguarding throughout our academy. | |
| Having a system where concerns can be reported immediately. | • Our academy use the CPOMs recording system. This is a secure digital platform that enables staff or other members of your organisation (such as volunteers) to record their safeguarding concerns quickly and easily.<br>• All staff know to report concerns to the school's DSL and seek advice from the trust safeguarding lead.<br>• Actions in response to any concerns are timely and effective |
| Supporting our pupils. | • Pupils understand what is unacceptable and how they can disclose this information to us, even if the disclosure isn't about them.<br>• Pupils feel safe and are confident to seek help if they need to. |
| Safeguarding Champion | • Our Safeguarding Champion supports our staff and safeguarding leads.<br>• Ensures that we follow the safer recruitment processes |
| Digital Infrastructure and Filtering Governance | The Executive Board of Directors holds ultimate accountability for ensuring all academy meet the DfE Filtering and Monitoring standards. The Board will designate a lead Director to review annual assurance reports from each academy. This review will verify that:<br>1. Automated alerting systems for safeguarding triggers (including CSAM and radicalisation indicators) are fully operational.<br>2. Filtering strategies block harmful material without unreasonably restricting access to educational resources.<br>3. The Trust's technical infrastructure blocks over-blocking, maintains real-time reporting, and includes clear escalation paths for system vulnerabilities. |
| Working with parents and carers | • Our academy support our parents and make sure that they are not only aware of what safeguarding is, but show them how they can report concerns to us.<br>• Our academy ensure that the parents of our pupils know that we are always there to hear their concerns and that their concerns will always be confidential. |
| Continual Professional Development | •Holy Name Catholic Primary School ensures that training is attended every September by all staff and governors.<br><br>• Holy Name Catholic Primary School ensures that regular practice in staff meetings is shared so that practical examples of safeguarding are discussed in order that we keep safeguarding at the forefront of all that we do. |

| | |
|---|---|
| | • Holy Name Catholic Primary School ensures that all staff understand and recognise risk, as well as potential signs of harm, abuse, neglect or exploitation and other safeguarding concerns. |
| Curriculum | • Elements of our curriculum enable pupils to recognise and respond to risks to their wellbeing which are successfully designed and delivered – for example,<br><br>o learning about online safety or healthy relationships.<br>o clear RSE programme in schools |
| Environment | • Our environment is effectively designed to safeguard students – this includes physical aspects of the learning environment as well as more cultural or behavioural elements, such as zero-tolerance of discriminatory language |

In order to uphold the highest standards of safeguarding across Holy Name Catholic Primary School, and in line with statutory guidance set out in Keeping Children Safe in Education (KCSIE), it is an expectation that all adults on site within our academy wear and clearly display their designated lanyards at all times. This ensures that all members of the community, including pupils, staff, and visitors, are able to clearly identify all adults within the school environment.

For consistency and security, lanyards are categorised and identifiable as follows and must be consistently embedded practice by December 2025:

- **Visitors** will report to reception on arrival where they will be signed in and issued with the appropriate lanyard of a single, uniform colour, which must be worn and visible at all times while on site, as follows:
- **Orange visitor lanyard:** school logo, Trust logo, the word 'visitor', orange lanyard
- **Red visitor lanyard: s**chool logo, Trust logo, the word 'visitor', red lanyard
- **School Staff** will wear lanyards of a single colour branded with the individual school logo (not with standard 'staff' lanyards).
- **Central Staff** will wear lanyards of a single colour with the distinctive St Gabriel the Archangel CMAT logo.

This expectation forms an integral part of our safeguarding culture and procedures, enabling immediate recognition, appropriate challenge, and assurance that only authorised individuals are present within our schools. Any adult found not wearing the appropriate lanyard, or failing to display it visibly, may be subject to challenge by staff and, where necessary, may be asked to leave the premises until their identity and authorisation to be on site have been verified.

# Local Arrangements

## Local Authorities Within St Gabriel the Archangel CMAT

St Gabriel the Archangel CMAT spans seven local authority areas. Each local area's multi-agency safeguarding arrangements are led by the statutory safeguarding partners/organisations: local authorities, clinical commissioning groups and the police

- BSCP – Birmingham Safeguarding Children Partnership.
- DSPP – Dudley Safeguarding People Partnership.
- SCSP – Sandwell Children's Safeguarding Partnership.
- SSCP – Staffordshire Safeguarding Children's Partnership.
- SSCP – Stoke on Trent Safeguarding Children Partnership.
- WSP - Walsall Safeguarding Partnership
- WST – Wolverhampton Safeguarding Together.

With respect to the Local Area Specific Safeguarding Information and Procedures, please refer to the Local Authority Key Contact page of this document.

# Roles and Responsibilities

## Roles and Responsibilities: Local Governing Body

Our Regional Safeguarding Champion is: INSERT NAME

Our Academy Safeguarding Champion is Mrs Jayne Logue

Our Local Governing Body has a strategic leadership responsibility for the safeguarding arrangements and will ensure they comply with their duties under legislation; they will have regard to 'Keeping Children Safe In Education' to ensure that the policies, procedures, and training in our school are effective and always comply with the law.

Our Local Governing Body will ensure that they facilitate a whole academy approach to safeguarding. This will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. They will ensure that all systems, processes, and policies operate with the best interests of the child at their heart.

Our academy will have a senior leader (or equivalent) within each academy who is responsible for our school's safeguarding arrangements, including filtering and monitoring systems for online safety.

Our Local Governing Body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our academy are effective and support the delivery of a robust approach to safeguarding. Their training will be regularly updated.

Our Local Governing Body should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements.

The Local Governing Body holds statutory responsibility under the Terrorism (Protection of Premises) Act for maintaining a culture of counter-terrorism preparedness.

1. The Board will formally designate the Trust Safeguarding Lead (supported locally by each Headteacher) as the **'Responsible Person'** under the Act.
2. The Trust has directed schools to utilise the free, official DfE and Home Office *Protective Security and Preparedness Guidance* tools to assess vulnerabilities following consultation with a specialist consultant

Our Local Governing Body will ensure:

Safeguarding Policies

- Appropriate policies and procedures are in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These policies will include an effective safeguarding/child protection policy, a code of conduct for adults which will amongst other things include – low level concerns, allegations against staff, whistle blowing plus acceptable use of technologies, staff/pupil relationships and communications including the use of social media and a school behaviour policy.
- Our safeguarding policies and procedures will be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.
- These policies, Part One of KCSIE and information regarding the role of the designated safeguarding lead and any deputies, will be provided to all staff on induction. Our Local Governing Body will take a proportional risk-based approach to the level of information that is provided to temporary staff and volunteers.
- This policy will describe procedures which are in accordance with government guidance and refer to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners. It will be updated annually (as a minimum) and be available publicly either via our website or by other means.
- That the above policies and procedures, adopted by our Local Governing Body particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Appropriate safeguarding arrangements are in place to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them being missing in the future.
- Where reasonably possible, our schools will hold more than one emergency contact number for each pupil.
- Reflects the academy's approach to child-on-child abuse.
- Behaviour policies will include measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

Designated Safeguarding Lead and Deputies

- Appoint an appropriate senior member of staff from the leadership team or equivalent to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- The DSL's role will be made explicit in the role-holder's job description.
- The designated safeguarding lead has the appropriate status and authority within their school to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.

- They determine whether they choose to have one or more deputy designated safeguarding lead(s) as appropriate. Any deputies appointed will be trained to the same standard as the designated safeguarding lead.
- That whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility will not be delegated.
- That the designated safeguarding lead and any deputies will liaise with the safeguarding partners and work with other agencies.
- The designated safeguarding lead and any deputies should liaise with the safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.
- During term time the designated safeguarding lead and or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Our Local Governing Body will ensure that the Headteachers/DSL arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
- The designated safeguarding lead and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years.

- Retain operational responsibility for safeguarding and configurations on the school network and academy-issued devices. The DSL will:

    - Review system logs, automated override requests, and weekly traffic anomalies generated by the filtering system.

    - Conduct a termly risk assessment of the filtering metrics alongside the IT Lead to ensure the system blocks harmful content, including sophisticated or masked queries.

    - Ensure that any alert indicating access or attempted access to illegal material (such as CSAM or terrorist content) triggers the immediate execution of the academy's emergency escalation protocol.

Multi-Agency Working

- Holy Name Catholic Primary School contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.
- We understand our role in the safeguarding partner arrangements.
- We will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to Family Help and Child Protection plans.

**Information Sharing**

- Our Local Governing Body will understand that sharing information is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. They understand that we have clear powers to share, hold and use information for these purposes.
- Our Local Governing Body understands and recognise the importance of information sharing between practitioners and local agencies. Our Local Governing Body will ensure arrangements are in place that set out clearly the process and principles of information

sharing within the school and with the three safeguarding partners, other organisations, agencies, and practitioners as required.

- Our Local Governing Body understands the Data Protection Act 2018 and that GDPR places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- Our Local Governing Body will ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR.
- Where children leave our schools, designated safeguarding leads will ensure their child protection file is transferred to the new school as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives ensuring secure transit, and confirmation of receipt will be obtained from the receiving school or college. The file will be transferred separately from the main pupil file. Our schools will ensure key staff such as designated safeguarding leads and SENCOs are aware as required.
- In addition to the child protection file, our designated safeguarding leads will also consider if it would be appropriate to share any safeguarding information with the new school or college in advance of a child leaving.

**Staff Training**

- That all staff members undergo safeguarding and child protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring. The training will be regularly updated. Our induction and training will be in line with advice from the safeguarding partners. In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings, designated CPD sessions during the academic year), to ensure that we continually upskill our staff to be vigilant in safeguarding. We will know the local context for safeguarding and schools will share this with staff to provide them with relevant knowledge to raise concerns effectively.
- Our Local Governing Body recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns daily. Our staff will be provided with the opportunity to contribute to and shape safeguarding arrangements and child protection policy.
- Safeguarding training, including online safety training, is integrated, aligned, and considered as part of the Trust's safeguarding approach.
- Whilst considering training requirements, there will be regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of pupils.

**Online Safety**

Our Local Governing Body understand that our academy increasingly work online and that it is essential that children are safeguarded from potentially harmful and inappropriate online material. They will ensure our schools:

- Meet the DFE filtering and monitoring standards and cyber security standards.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet our safeguarding needs.

- Nominates a member of the governing body to have responsibility for online safety, including filtering and monitoring in each school.

The Local Governing Body will review the standards and if necessary, discuss with leaders what more needs to be done to support the school in meeting standards.

- Remote learning - Where children are being asked to learn online at home, our academy will refer to and use the links and resources provided by the DfE: safeguarding in schools, colleges and other providers and safeguarding and remote education.
- Technology and the risks and harms associated with it evolve rapidly. We will review our approach to online safety annually, supported by an annual risk assessment.

**Opportunities to Teach Safeguarding**

- Our Local Governing Body will ensure that children are taught about how to keep themselves and others safe, including online. This education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- We will teach about online challenges and hoaxes and share information about this with parents and carers.
- Relevant topics will be included within Relationships Education (for all primary pupils), and Relationships and Sex Education (for all secondary pupils) and Health Education (for all primary and secondary pupils). In teaching these subjects we will have regard to the statutory guidance.
- We have a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. We will have a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

**Inspection**

Our Local Governing Body are familiar with the OFSTED Toolkit.

**Safer Recruitment**

- Our Local Governing Body prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Our academy has written recruitment and selection policies and procedures in place that are regularly reviewed.
- They will ensure that short-listed candidates receive online searches, and this is made explicit in the job advert or on the letter for interview.
- At least one person on any appointment panel has undertaken appropriate safer recruitment training.
- They will ensure that the policies and procedures are monitored to ensure they are effective and embedded.
- They will ensure that the SCR is regularly audited by an appropriate member of staff.

**Dealing With Concerns About Staff Who May Pose A Risk Of Harm To Children.**

Staff must report allegations without delay, in line with the following reporting lines:

- Allegations regarding another member of staff will be reported to the Principal
- Allegations regarding a member of staff's own actions or conduct must be reported to the Principal via self-referral

- Allegations regarding a member of staff in the central team will be reported to the COPO (Chief Operating People Officer) who will be supported by the Trust Safeguarding Lead and reported to the CEO
- Allegations regarding the COPO or Trust Safeguarding Lead will be reported to the CEO
- Allegations against the CEO will be reported directly to the Chair of the Board of Directors
- Allegations regarding the Principal will be reported to the CCOPO and TSL. The TSL will advise the CEO and CSEL. Allegations regarding the Principal will be reported directly to the LADO via the COPO supported by the Trust Safeguarding lead where appropriate.
- Any instances where internal (school based) investigation panels recommend referral to TRA, the Trust Safeguarding Lead should be contacted in order that the referral can be made
- Any calls made to the LADO to discuss low level concerns and/or allegations should be reported to consultancy HR and records retained on file.
- Any LADO referrals submitted should be reported to consultancy HR
- Any DBS referrals submitted should be reported to Trust Safeguarding Lead
- Any Ofsted complaints received should be reported to regional CSEL
- Any Local Authority complaints received should be reported to regional CSEL
- In all cases, the Trust Safeguarding Lead, the Regional CSEL, and the Birmingham Diocesan Education Service Director for Education must be notified in accordance with Protocol 4. All schools within our Trust strictly follow the statutory procedures outlined in Part 4 of *Keeping Children Safe in Education*.
- Our Executive Board of Directors will ensure that schools respond to "low level" concerns as set out in Section 2 of Part 4 of KCSIE.
- Our Executive Board of Directors ensure that procedures are in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Our Executive Board of Directors are aware that this is a legal duty and failure to refer when the criteria are met is a criminal offence.

| Low Level Concerns and Allegations: Reporting Channels | | |
|---|---|---|
| Low level concerns and/or allegations against a member of staff | → | Must be reported to the Principal |
| Low level concerns and/or allegations regarding a member of staff's own conduct must be reported to the Principal via self-referral | → | Must be reported to the Principal via self-referral |

| Low Level Concerns and Allegations: Reporting Channels | | |
|---|---|---|
| Low level concerns and/or allegations against the Principal | → | Must be reported to the Chair of Governors, who must report to the COPO and TSL. The TSL will advise the CEO and CSEL. Allegations regarding the Principal will be reported directly to the LADO via the COPO supported by the Trust Safeguarding Lead where appropriate.<br><br>Allegations regarding the Principal will be reported directly to the LADO via the COPO |
| Low level concerns and/or allegations regarding a member of staff within the Central Team | → | Must be reported to the COPO who will be supported by the Trust Safeguarding Lead |
| Low level concerns and/or allegations regarding the COPO or Trust Safeguarding Lead | → | Must be reported to the CEO |
| Low level concerns and/or allegations against the CEO | → | Must be reported directly to the Chair of the Board of Directors |

**Child-On-Child Abuse**

- All staff should recognise that children can abuse their peers (including online). Our Local Governing Body will ensure that all staff are clear about trust policies and procedures regarding child-on-child abuse.

**The Child's Wishes**

The child's wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Systems and processes will operate with the best interests of the child at their heart.

**Children Potentially At Greater Risk Of Harm**

Children who need a social worker (Family Help and Child Protection Plans)

Our DSL/or deputies are aware that some children may need a professional from social services due to safeguarding or welfare needs. Local authorities should share the fact that a child has a social worker. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning,

behaviour, and mental health. The designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

**Children Requiring Mental Health Support**

Our academy has an important role to play in supporting the mental health and wellbeing of their pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Our Local Governing Body ensure our schools have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

**Looked After Children and Previously Looked After Children**

Our Local Governing Body ensure

- That staff have the skills, knowledge and understanding necessary to keep looked after children safe.
- That appropriate staff in each school have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding leads should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

**The Designated Teacher (DT)**

Our Local Governing Body ensure

- That we appoint a designated teacher to work with local authorities to promote the educational achievement of registered children who are looked after and to ensure that this person has appropriate training. With the commencement of the sections 4-6 of the Children and Social Work Act 2017, the designated teacher in each school will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales
- That the designated teacher has appropriate training and relevant qualifications and experience

The Use of Restrictive Interventions Including Reasonable Force

Our Local Governing Body know and understand there are circumstances when it is appropriate for our staff to use restrictive interventions including reasonable force to safeguard children and young people. The term covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed' for the shortest possible duration.

Our Local Governing Body know and understand that physical intervention or restrictive practice can be deeply traumatising for both pupils and staff, carrying the potential to damage long-term relational trust. Our academy is committed to a positive, relational, and trauma-informed

behaviour culture. Restrictive interventions must never be used as a disciplinary sanction or punishment. They represent a strictly protective safety measure of last resort, deployed only when all proactive prevention, environmental adjustments, and low-arousal de-escalation strategies have been exhausted.

The Local Governing Body expects all staff to adhere to the following statutory definitions and principles:

- **Reasonable Force:** The minimum necessary physical force applied for the shortest possible duration to prevent a pupil from causing injury to themselves or others, committing a criminal offense, causing damage to property, or causing serious disorder at the school or maintaining good order and discipline.
- **Prohibited Practices (Airway & Breathing Safeguard):** Staff must **never** use any physical intervention or restraint technique that restricts a child's airway, breathing, or circulation, or applies pressure to the neck, throat, chest, or abdomen. Positional asphyxiation risks must be actively avoided at all times.
- **Significant Incident:** Any instance where staff-on-pupil physical contact involves force that goes beyond day-to-day appropriate physical contact (such as guiding a child safely, comfort, or providing medical first aid). All significant incidents carry a statutory requirement to be recorded and reported to parents/carers as soon as reasonably practicable.
- **Restraint (Physical and Non-Physical):** The positive application of force with the intention of overpowering a pupil or subduing their movement. This legal definition extends to non-physical restraint, such as purposefully removing a pupil's auxiliary mobility aid (e.g., walking frame or wheelchair) to limit their movement.
- **Seclusion:** A non-disciplinary safety intervention where a highly dysregulated pupil is kept alone in a safe space away from others and is physically prevented from leaving, or is led to believe that attempting to leave will result in an immediate penalty. Seclusion can only be used to protect individuals from immediate, severe physical harm. The pupil must remain under continuous visual supervision by staff, and the seclusion must end the exact moment the immediate risk of harm decreases.

The Local Governing Body maintains active oversight of all restrictive practices across the academy, ensuring that incident data is systematically reviewed to safeguard pupil welfare, support staff development, and proactively reduce the need for interventions over time.

<table>
<tr><td colspan="2">Significant Incident Occurs<br>(Use of Force, Restraint, or Seclusion)</td></tr>
<tr><td colspan="2">IMMEDIATE SAME-DAY ACTIONS</td></tr>
<tr><td>1. Mandatory Digital Record<br>• Log on CPOMs/MIS by end of day.<br>• Must list SEND needs, rationale, de-escalation steps tried, and full injury/medical checks.</td><td>2. Parental Notification<br>• Written notice issued to parents.<br>• If seclusion/restraint occurred, provide exact copy of the written incident record.</td></tr>
<tr><td colspan="2">POST-INCIDENT WRAPAROUND<br>• DSL/SENCO review triggers and co-produce Behaviour Support Plan.<br>• Debrief session provided for both the pupil and staff involved.</td></tr>
</table>

A comprehensive digital entry must be finalised on the school's safeguarding platform (CPOMs) before the member of staff leaves the site on the day of the event. As a statutory minimum, this record must capture:

1. The names of the pupil and all staff members involved or witnessing.
2. The specific underlying needs of the pupil, highlighting special educational needs or disabilities (SEND).
3. The exact time, precise location, and total duration of the intervention.
4. A clear narrative of what occurred, explicitly detailing what de-escalation techniques were attempted prior to physical intervention, the justification for why the intervention was deemed necessary, and the specific degree of force used.
5. A detailed record of injuries sustained by pupils or staff, alongside immediate medical and follow-up support actions provided.

Parents or carers must be notified in writing as soon as practically possible, and ideally by the end of the school day.

- For a standard significant use of force, a comprehensive written report detailing the event must be provided.
- Where the incident meets the statutory definitions for seclusion or restraint, the regulations dictate that the academy must supply the parents with an exact copy of the actual written incident record to ensure total transparency.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, our academy will consider the risks carefully and recognise the additional vulnerability of these groups. We will also consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination, and our Public Sector Equality Duty. Every significant incident must trigger an immediate review of the child's profile. The DSL, alongside the SENCO and other relevant leaders or staff, must work closely with parents and external multi-agency professionals (if relevant) to co-produce or update an individualised Pupil Safety and Support Plan. This plan must outline personalised triggers, sensory or communication adjustments, and agreed environmental parameters to minimise the likelihood of future physical interventions.

Our academy does not adopt a 'no contact' policy, we have a policy which allows and supports our staff to make appropriate physical contact that enables staff to fully support and protect our children. We have appropriately trained staff to support any incident with a child that requires physical intervention. The decision on whether to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and will always depend on individual circumstances. All student-facing staff must complete annual training focused heavily on positive behaviour cultures, trauma-informed responses, and low-arousal de-escalation techniques.

## Use Of School/College Premises for Non-school/college activities

Our Local Governing Body will

- Ensure that the appropriate arrangements are in place in all schools to keep children safe when organisations/individuals rent/ hire school facilities.
- Ensure that leaders seek assurance that the renter/hirer has the appropriate safeguarding and child protection policies in place (including inspecting these if needed) and ensure that there are arrangements in place to liaise with the academy on these

matters if needed. Safeguarding arrangements will be included in any transfer of control agreement/lease or hire agreements, as a condition of use and occupation. Agreements will be terminated if there is failure to comply.

- In our contracts for leasing/hire of our premises, it will state that if we are alerted to an allegation made against an adult from an organisation using our setting, we will follow our safeguarding procedures, and this could include reporting this allegation to the LADO.

## Roles and Responsibilities - Designated and Deputy Safeguarding Lead/s

The Role of the DSL/DDSL:

Manage Referrals:

- Refer cases of suspected abuse to the local authority children's social care as required
- Make appropriate referrals to external services to support children at Early Help level
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the police as required

Work With Others:

- Liaise with the headteacher to inform them of issues especially on-going enquiries under section 47 of the Children Act 1989 and police investigations. This will include being aware of the requirement for children to have an appropriate adult (PACE Code C 2019)
- Act as a point of contact with the safeguarding partners
- As required, liaise with the "case manager" (as per Part four) and the designated officer (LADO) at the Local Authority for child protection concerns in cases which concern a staff member
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians, and SENCOs, senior mental health leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Act as a source of support, advice, and expertise for all staff
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:
    - ensuring that the school knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker to reach their

potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Training, Knowledge and Skills:

- Undergo training to provide them with the knowledge and skills required to carry out the role. **This training will be updated at least every two years.**
- The DSL/DDSL will undertake PREVENT awareness training and referral training for Channel
- The DSL/DDSL know how to identify, understand, and respond to specific needs that can increase the vulnerability of children, as well as the specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care. This knowledge includes:
    - understanding the assessment process for providing early help and statutory intervention, including local criteria for action and Local Authority children's social care referral arrangements.
    - having a working knowledge of how Local Authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
    - understanding the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children
    - understanding the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
    - being alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
    - understanding the importance of information sharing, both within the school and with the safeguarding partners, other agencies, organisations, and practitioners
    - understanding and supporting the school with regards to the requirements of the PREVENT duty and can provide advice and support to staff on protecting children from the risk of radicalisation
    - understanding the unique risks associated with online safety and have the responsibility for the filtering and monitoring software used in our school
    - recognising the additional risks that children with special educational needs (SEND), disabilities and neurodivergence can face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support these children to stay safe online
    - obtaining access to resources and attend any relevant or refresher training courses
    - encouraging a culture of listening to children and taking account of their wishes and feelings

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

Raise Awareness:

- Ensure the school safeguarding and child protection policies are known, understood, and used appropriately, especially with all new and part time staff.

- Ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) in response to the Trust's Safeguarding Policy, and that the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure the safeguarding and child protection policy is available publicly and parents know referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this.
- Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

Information Sharing and the Child Protection File

Whilst we adhere to the UK GDPR and Data Protection Act 2018, staff must understand that data protection legislation does not prevent the sharing of information to safeguard children. Staff do not require the consent of individuals or families to share personal data with statutory safeguarding partners if there is a reasonable belief that a child is at risk of harm or if seeking consent would increase that risk. All data sharing decisions must be logged with their safeguarding rationale.

The designated safeguarding lead is responsible for ensuring that safeguarding and child protection files are kept up to date.

Information should be kept confidential and stored securely. They will ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in KCSIE.

Where children leave the school, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and SENCOs, are aware as required.

Availability:

- The designated safeguarding lead or deputy will be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst our designated safeguarding lead (or deputy) will be available in person, there may be occasions, in exceptional circumstances, when this is not possible; however they may be available via e-mail, phone and/or Teams/Google
- Our school will arrange adequate and appropriate arrangements for any out of hours/out of term activities.

Providing Support to Staff

The DSL/DDSL will have expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

The DSL/DDSL will support staff with supervision as necessary.

## Understanding the Views of Children

The DSL/DDSL will:

- encourage a culture of listening to children and taking account of their wishes and feelings
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding And Sharing Information

The DSL/DDSL will be equipped to:

- understand the importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary, secondary and post-16 education and with the safeguarding partners, other agencies, organisations, and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- be able to keep detailed, accurate, secure written records of concerns and referrals, including justifications for decisions that have been made to meet the needs of a child or young person

The DSL will contribute to a safeguarding report for governors, Regional CSEL and CEO at least termly.

## Roles and Responsibilities - All staff

All staff are given part one of KCSiE and all staff receive annual safeguarding training and regular safeguarding updates throughout the course of the year. Staff confirm that they have received, read, and understood our school's safeguarding policies and procedures and that they have attended safeguarding training.

- To ensure information is preserved accurately, staff must log all safeguarding concerns directly onto CPOMs as soon as possible.

- For any issue involving immediate, acute physical risk, or potential exploitation, the digital log must be accompanied by an immediate face-to-face or direct verbal notification to the DSL. Staff must not delay inputting digital entries while waiting for a face-to-face meeting.

- All staff have a responsibility to provide a safe environment in which children can learn.

- All staff have a responsibility to identify children who may benefit from early help or who are suffering, or are likely to suffer, significant harm.

- Any staff member who has a concern about a child must follow the referral process.

- All staff have a responsibility to take appropriate action, our staff will be expected to support social care and other agencies following referrals.

- In addition to working with the designated safeguarding lead or deputy designated safeguarding lead staff members should be aware that they may be asked to support social workers and other agencies to support with Early Help work for a pupil.

- During induction, all staff members will be made aware of the systems within their school which support safeguarding systems, and these will be explained to them as part of their induction programme.

- All staff members will receive appropriate safeguarding/child protection updates regularly throughout the academic year to maintain a vigilant culture for safeguarding.

- All staff will be made aware of procedures for online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

- All staff will be made aware of the local early help process and understand their role in it.

- All staff will be made aware of what to do if a child discloses that they are being abused, neglected or exploited.

- All staff members will be made aware of the types and signs of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection
- All staff should be aware of the seven golden rules for sharing information, if in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy.

- Staff should ensure that if a child has made a disclosure, they are aware that the information will only be shared with the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse.

- All staff should speak to the designated safeguarding lead with regards to any concerns about female genital mutilation. Our teachers know that there is a legal duty placed upon, teachers must report to the police if they discover that an act of female genital mutilation appears to have been carried out on a girl under the age of 18.

- If staff have concerns, or an allegation is made about another member of staff (including volunteers and supply staff) posing a risk of harm to children, then the concern should be referred to the headteacher. If the concern is about the headteacher the member of staff should report this to the chair of governors. Our staff will comply with the guidelines in part four of KCSIE 2026.

- Staff will follow the school's whistleblowing policy and procedures or contact the NSPCC whistleblowing helpline.

- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their

experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues

The DSL retains operational responsibility for safeguarding configurations on all school networks and academy-issued devices. The DSL will:

- Review system logs, automated override requests, and weekly traffic anomalies generated by the filtering system.

- Conduct a termly risk assessment of the filtering metrics alongside the IT Lead to ensure the system blocks harmful content, including sophisticated or masked queries.

- Ensure that any alert indicating access or attempted access to illegal material (such as CSAM or terrorist content) triggers the immediate execution of the Trust's emergency escalation protocol.

## Roles and Responsibilities - Supply Staff, Trainee Teachers Volunteers and Students

The designated safeguarding lead will explain the responsibility of reporting and recording any concerns about children's safety and welfare. Further, they will be briefed on the school's confidentiality policy and the staff code of conduct policy.

Therefore, supply staff, trainee teachers, volunteers and work experience students have the responsibility to:

- Work within the school's code of conduct, KCSIE, safeguarding/child protection policy, acceptable use of technology policy and confidentiality/information sharing expectations
- Immediately share any concerns about a child's welfare with the designated safeguarding lead or DDSL using the appropriate reporting and recording systems (these may be bespoke depending on the role of the adult).

## Parental Responsibilities

Our academy has an open-door policy where we encourage parents to share any concerns regarding their own children or any other child/children who they feel may be at risk of harm. All concerns will be explored in a sensitive and timely manner. We will always ask for consent from parents to seek additional support from partner agencies to meet the needs of the child/young person and family. If gaining consent would put the child/young person at risk of significant harm, this won't be sought.

Parents /carers should ensure their child attends school every day and that they arrive on time and are collected on time.

Should a pupil not be collected on time, the academy will ensure that safeguarding arrangements are in place and the pupil will always be supervised by a member of staff until parents/carers arrive. In exceptional circumstances, we will follow the partnership Children not Collected policy and speak with the appropriate IFD or MASH for support and advice to ensure

the child can get home safely (this may involve professionals supporting from partner agencies and/or the child being transported by a trusted adult other than the parent/carer).

We expect parents/carers to notify us of any changes in family circumstances and inform us of any changes of address and contact numbers and where reasonably possible to provide more than one emergency contact number.

### Children's Responsibilities

The safeguarding culture within our academy is one that encourages all children to do their best and to talk freely about any concerns or worries. We provide opportunities that enable our children to take and make decisions for themselves.

Children will always be taken seriously and listened to if they seek help from a member of staff. Our academy encourages all pupils to share any worries or concerns with any adult at any time.

## Confidentiality and Information sharing

Our academy adopts the principles outlined in the DfE Information sharing guidance (May 2024). Data protection legislation (the Data Protection Act 2018 (the DPA 2018) and UK General Data Protection Regulation (UK GDPR)) does not prevent the sharing of information for the purposes of safeguarding children, when it is necessary, proportionate, and justified to do so. In fact, data protection legislation provides a framework which enables information sharing in that context. The first and most important consideration is always whether sharing information is likely to support the safeguarding of a child.

We recognise that all matters relating to child protection are confidential. The designated safeguarding lead and deputies within Holy Name Catholic Primary School will disclose any information about a child to other members of staff on a need-to-know basis only. All staff know they have a professional responsibility to share information with other statutory agencies to safeguard children.

All staff know they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. If a child wishes to confide in a member of staff and requests that the information is kept secret, the member of staff will appropriately state that they cannot promise confidentiality and will need to pass the information on to help keep the child or other children safe.

Communication With Parents

Staff will always discuss concerns with parents/carers and consent for any referrals should be sought unless to do so would:

- Place the child at risk of significant harm or further risk of significant harm.
- Place a vulnerable adult at risk of harm.
- Compromise any enquiries that need to be undertaken by children's social care or the police.

Holy Name Catholic Primary School will endeavour to ensure that parents understand the responsibilities placed on schools and staff to safeguard children.

In the best interests of safeguarding children there may be occasions when we may consult with other agencies without parent or carer prior knowledge. Such consultation may result in a formal referral which could prompt visits from social care and/or the police. We fully understand

that this can be a very distressing set of circumstances. Our academy will follow the procedures required by the multi-agency partnership arrangements.

The visit may take place at the relevant school at the request of the police or social care. In the event of the meeting being held at school parents/carers will be asked to remain on the school premises until such time that the police or social care can attend. If parents/carers choose to leave the premises with their child, the school will contact the police or social care to inform them of the parent/carer decision.

Our schools will endeavour to employ the services of an interpreter if required.

## Advice For All Staff, Supply Staff, Trainee Teachers and Volunteers - What To Do If A Child Discloses

All staff will refer to 'What to do if you are worried a child is being abused' DfE March 2015

Our staff will:

- Keep an open mind.
- Reassure.
- Listen carefully.
- Work at the child's pace.
- Where appropriate, ask only open questions in a non-leading way.
- Record accurately and quickly using the child's words/action.
- Pass all the information on to the DSL, or the deputy DSL as immediately as possible
- At all times, keep children and young people safe.
- Treat everyone with respect.
- Follow the procedures for reporting and recording safeguarding concerns.

Our staff won't:

- Make false promises
- Interrupt/interrogate/investigate
- Make assumptions
- Make suggestions about what is being said
- Speculate or accuse anyone
- Show anger, shock etc.
- Tell the child to go and speak to someone else
- Discuss with parent/carers without speaking to the DSL
- Forget to record accurately and/or pass on to DSL
- Discuss with any other staff other than the DSL
- Leave any related written information laying around
- Jump to conclusions about people's behaviour without knowing the facts
- Investigate an allegation of child protection concern themselves

## Our Reporting And Recording Procedures

No one working for Holy Name Catholic Primary School should investigate concerns about individual children or vulnerable adults who are or may be being abused or who are at risk. However, this does not mean that we should do nothing when we learn of a concern. We all have a responsibility to make sure that concerns about children and vulnerable adults are passed to the DSL without delay.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. When staff have any concerns about a child's welfare, they should act on them immediately. See Appendix A for a flow chart setting out the process for staff when they have concerns about a child. Any safeguarding disclosure reported by a child to their school will automatically be referred to social care (if relevant) and recorded on CPOMs.

The Threshold Guidance Document for each academy's specific local authority will be included within their Academy Safeguarding Policy:

Multi-Agency Thresholds & Request Form - Sandwell CSP

All staff should report safeguarding concerns in person to their DSL/DDSL and then follow this up by recording the disclosure / concern on CPOMS. When recording on CPOMS staff should ensure that they:

- Do not use emotive language. E.g. I was terrified of upsetting the parents...
- Do not use personal opinion. E.g. The child appeared fine…
- Do not go into unnecessary contextual detail, use specific times and locations. E.g. After break time before
    - they had their milk but before I took my coat off, I noticed that…
- Always use full names, do not use initials. E.g. TL should be Tracy Lane
- Always write in the first person. E.g. I contacted social care at… They advised me to…
- Always record accurately where and when the incident took place. E.g. Classroom 1, 13:24.
- When a referral is needed, then the DSL will make it initially by telephone then followed up by completing
    - a Multi-Agency Safeguarding referral form and sending it immediately following the initial phone call via
    - email to social care contact. However, anyone can make a referral and when for any reason a staff
    - member thinks a referral is appropriate and one hasn't been made, they can and will consider making a
    - referral themselves.
- The child (subject to their age and understanding) and the parents will be told that a referral is being
    - made, unless to do so would increase the risk to the child.
- When, after a referral the child's situation does not appear to be improving the designated safeguarding
    - lead (or the person that made the referral) will press for re-consideration to ensure their concerns have
    - been addressed, and most importantly the child's situation improves. This will initially be followed up with
    - the social care worker leading the referral or Local Authority Designated Safeguarding Officer
- When a child is in immediate danger or is at risk of harm a referral will be made to children's social care
    - and/or the police immediately. Anybody can make a referral.
- Where referrals are not made by the DSL, the DSL will be informed as soon as possible.

## Earliest Help and Family Help

Our academy operates in line with the statutory continuum of support outlined in *Working Together to Safeguard Children (WTTSC) 2026* and *Keeping Children Safe in Education (KCSIE) 2026*. We recognise that providing support as soon as a problem emerges (Earliest Help) or via coordinated multi-agency support (Family Help) is vital to improving outcomes for children and preventing escalation to statutory social care safeguarding thresholds.

While any child may benefit from these supportive pathways at any point in their lives, our staff remain particularly alert to the potential need for Earliest Help or a Family Help assessment for a child who:

- Is disabled, has a complex health condition, or has special educational needs regardless of whether they hold a statutory Education, Health and Care (EHC) plan, requiring targeted multi-agency coordination to thrive.
- Is experiencing mental health or emotional wellbeing difficulties, including those manifesting as school avoidance, anxiety, or severe distress.
- Is a young carer, carrying inappropriate or excessive caring responsibilities that impact their education, health, or development.
- Is showing signs of extra-familial threat or exploitation, including being drawn into anti-social behaviour, serious violence, gang involvement, organised crime groups, or county lines networks.
- Is vulnerable to modern slavery, trafficking, or technological/online exploitation, as well as criminal or sexual exploitation (CSE/CCE).
- Is at risk of radicalisation, extremist grooming, or being drawn into hateful ideologies.
- Is frequently missing, or at risk of going missing, from education (persistently absent), home, or care.
- Is experiencing severe educational disruption, including multiple suspensions, or is at risk of permanent exclusion from mainstream schools, colleges, Alternative Provision, or Pupil Referral Units (PRUs).
- Is living in a family circumstance experiencing interconnected challenges, where a coordinated Family Help approach is needed to address issues such as domestic abuse, parental substance/alcohol misuse, or adult mental health difficulties.
- Is directly impacted by the criminal justice system, including having a parent or carer currently in custody, or being affected by familial offending.
- Is misusing alcohol, controlled drugs, or other substances themselves.
- Is at risk of honour-based abuse, including Female Genital Mutilation (FGM), Forced Marriage, or unexpected extended travel abroad.
- Is a privately fostered child, whose living arrangements require official notification to the local authority.

## Making a Referral to Children's Social Care

Upon receipt of a safeguarding concern, the school's designated safeguarding lead or deputy will decide and seek advice to determine whether the concern/disclosure meets a threshold for support.

The designated safeguarding lead or deputy will consider:

Is this a child with unmet needs where health, development or achievement may be affected?

Schools may complete an Early Support Plan (ESP) when:

- Age-appropriate progress is not being made, and the causes of concern can be supported by us as a single agency
- The support of more than one agency may be needed at some point to meet the child or young person's needs

If this is a child with additional needs the school's designated safeguarding lead or deputy will discuss the issues with the child's parents/carers. The designated safeguarding lead or deputy must obtain parental consent for an Early Support Plan to be completed.

Is this a child in need (CIN)?

Section 17 of the Children Act 1989 says:

- The child is unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development
- The child's health or development is likely to be impaired, or further impaired without the provision of such services
- The child has a disability.

Is this a Child Protection matter (CP)?

Section 47 of the Children Act 1989 says:

- Children at risk or who are suffering significant harm
- Children suffering the effects of significant harm
- Serious health problems.

All concerns, child with unmet needs, Child in Need and Child Protection matters, MUST be discussed with the designated safeguarding lead or deputy, and will need to be assessed and referred using our reporting and recording systems.

All our staff understand their responsibility for working with other professionals to offer Early Help with our children.

## Making A Referral

If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and /or the police immediately.

The schools' designated safeguarding leads or deputies will be the appropriate staff to initiate any referral. A record of the concerns should be made using the school's reporting and recording system. This should be used to aid in the decision-making process if a referral is needed to social care.

Advice may be for DSL/DDSLs to complete a MASH referral.

DSL/DDSLs will seek consent from parents/carers before submitting a referral and the content on the referral will be known to the parent/carer. Following submission, the referral will be held on the pupil's record.

If there is risk of significant harm or significant harm to a child, DSL/DDSLs will not seek consent to submit a referral. Therefore, the content on the referral will be unknown to the parent/carer.

The Threshold Guidance Document for each academy's specific local authority will be included within their Academy Safeguarding Policy:

Multi-Agency Thresholds & Request Form - Sandwell CSP

### Voice of the Child – (Children's Wishes)

Our academy is committed to a child-centred approach where the voice, wishes, and feelings of the child actively shape every stage of support.

When identifying a need for Earliest Help or collaborating on a Family Help plan, the child is never merely the subject of a process; they are an active participant.

To ensure the child's lived experience drives our actions, we adhere to the following principles:

- A child's wishes, feelings, and unique communication needs are established and centred whenever determining what action to take or what services to provide. This applies regardless of the child's age, communication barriers, or complex needs.
- We maintain clear, accessible, and safe systems across our schools for children to express their views, share their worries, and give feedback on the support they are receiving.
- Staff are trained to look beyond just what a child *says*, observing their behaviour, attendance, and emotional wellbeing to understand their true day-to-day lived experience.
- While staff must build trusting, supportive relationships to facilitate Earliest Help, they never promise absolute confidentiality if a safeguarding or child protection concern is raised. Staff will explain to the child, in an age-appropriate way, that information must be shared to get them and their family the right support.
- At all times, the school acts in the absolute best interests of the child, ensuring that their safety, welfare, and right to be heard remain paramount in all multi-agency Family Help processes.

## Record Keeping

All records of concerns and safeguarding/child protection files are stored separately from the pupil's school file.

If a pupil moves school, our schools will transfer the files either in person or the file will be transferred securely via electronic systems and separately from the pupil's main file within 5 days. Schools will obtain a receipt from the receiving school. If one of our schools is the last known school the child attends, records will be retained until the child's 25th birthday.

If a pupil arrives with a child protection file, our schools will ensure key staff such as designated safeguarding leads, designated teacher and SENCOs are aware as required.

In addition to the child protection file, our designated safeguarding leads will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

## Looked After Children and Previously Looked After Children

Holy Name Catholic Primary School has appointed a designated teacher:

MR ANDREW NEENAN (HEADTEACHER)

Their role is to undertake any relevant training to update their skills, understanding and knowledge to enable them to keep our looked after children and previously looked after children safe. Our designated teacher will promote the educational, physical, social, and emotional welfare of children who are looked after and previously looked after children.

Previously looked after children are children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.

Our designated teacher will ensure:

- They obtain information regarding contact arrangements with birth parents or those with parental responsibility.
- They obtain information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- They obtain the name of the child's social worker.
- They obtain the name and contact details of the virtual headteacher in the local authority that looks after the child.
- They liaise with the virtual school headteacher to discuss how the funding for that child can be best used to support the child's needs outlined in the personal education plan.

## Care Leavers

Local Authorities have on-going responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training.

Our designated safeguarding lead or deputies should be given details of the Local Authority personal advisor appointed to guide and support the care leaver. Our designated safeguarding lead or deputies will liaise with the personal advisor as necessary regarding any issues of concern affecting the care leaver.

## Children with Special Educational Needs, Disabilities, or Health Issues

We are aware that children with special educational needs, disabilities, neurodivergent or certain health issues may face additional safeguarding challenges both online and offline. Barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children with SEN and disabilities and certain medical conditions can be disproportionally impacted by things like bullying- without outwardly showing any signs

- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Communication barriers and difficulties in overcoming these barriers.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in setting or the consequences of doing so.

We will ensure we have appropriate mechanisms in place to assist these children. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding leads (or deputy) and the SENCO. We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Our schools will seek support from The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) if necessary.

## Children who are Lesbian, Gay, Bi Or Trans (LGBT)

Our school is committed to providing a safe, inclusive environment where all children can learn free from harm, discrimination, or harassment.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. A child or young person's sexual orientation or gender identity is not, in itself, an inherent risk factor for harm. However, staff must remain alert to the fact that children who are, or are perceived to be, LGBT may face elevated risks of bullying, isolation, or targeted harm from peers. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Our staff actively work to dismantle barriers to reporting, ensuring that all pupils have access to a safe space and a supportive environment to voice their concerns. Our staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

With sensitive topics such as gender questioning and social transition, our schools will always strive to keep the interests of the child at the centre of our support mechanisms and individuals will be supported by the safeguarding and pastoral teams on a case-by-case basis.

Our schools will consider the DFE guidance for gender questioning when supporting individual pupils.

When a child is questioning their gender or expressing a desire to socially transition (e.g., changing their preferred name, pronouns, or uniform), our schools will follow a holistic, cautious, and case-by-case approach. In alignment with statutory DfE guidance on *Gender Questioning Children*, our framework ensures that:

- We recognise that parents and carers are almost always central to a child's wellbeing. Except in the rarest circumstances where involving parents would pose a direct and significant risk of harm to the child, our school will involve parents at the earliest opportunity. This collaborative approach forms part of our commitment to Family Help, ensuring home and school work together in the child's best interests.
- Decisions regarding a child questioning their gender are highly complex. Our school will allow for a period of careful consideration, taking into account the child's age, maturity, cognitive understanding, and any underlying needs (such as SEND or mental health difficulties).

- No changes to school records, pronouns, or social arrangements will be made hastily or without a formal, multi-agency assessment where appropriate. Our school will not feel pressured to rush into social transition measures and will prioritise the child's overall psychological and physical health.
- Any supportive measures implemented for a gender questioning child will carefully balance the individual child's wishes with the impact on the wider school community, safeguarding duties, and fairness to other pupils (including maintaining the privacy and safety of single-sex spaces).

Where gender questioning or LGBT-related distress intersects with severe emotional distress, self-harm, or family conflict, staff will immediately engage the Designated Safeguarding Lead (DSL). The DSL will determine whether a referral to Earliest Help, a multi-agency Family Help assessment, or external specialist mental health services is required to ensure the child and their family receive appropriate, structured support.

## Safeguarding Training

All staff members will undergo safeguarding and child protection training at induction. The training will be regularly updated.

Upon appointment and starting the new post, new staff, students and volunteers will be issued with an induction pack, safeguarding and child protection policy, Keeping Children Safe in Education -Part 1, Whistleblowing Policy, Management of Allegations Policy, Code of Conduct, Acceptable use of IT policy, the relevant school's behaviour policy, children absent from education procedures and other relevant safeguarding information e.g. the name of the designated safeguarding leads/DDSLs. They will sign to say that they have received it, read, and understood it.

All staff members will receive regular safeguarding and child protection updates including online safety (for example, via email, e-bulletins, staff meetings, designated CPD sessions during the academic year), to provide them with relevant skills and knowledge to safeguard children effectively.

Our Local Governing Board recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns daily. Opportunity will therefore be provided for staff to contribute to and shape safeguarding arrangements and the safeguarding and child protection policy.

### Safer Recruitment Training

Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

The member of staff who holds the SCR will have appropriate safer recruitment training which will be renewed regularly.

## Safer Working Practices

Our Trust has a code of conduct; all staff, supply staff and volunteers within Holy Name Catholic Primary School are issued with this at induction.

To create a safe environment for our children, our academy adopts rigorous safer recruitment procedures that deter, reject, or identify people who might abuse children, as outlined in Part

3 of *Keeping Children Safe in Education (KCSIE) 2026*. We continuously monitor our practices to ensure these procedures are deeply embedded and effective.

- Our schools ensure that at least one member of any recruitment panel has received accredited, up-to-date safer recruitment training.
- Our schools strictly adhere to statutory responsibilities to check all staff who work with children, exercising professional judgment on whether to mandate checks beyond the statutory minimum, and ensuring all volunteers are appropriately risk-assessed and supervised.

Within Holy Name Catholic Primary School, all shortlisted candidates must complete a comprehensive self-declaration of their criminal record and any information that would make them unsuitable to work with children.

In addition, as an essential element of our shortlisting due diligence, **t**he academy will conduct a targeted online search on all shortlisted candidates prior to interview. This search is designed to identify any incidents, convictions, or disciplinary issues that are publicly available online, which we may wish to explore with the applicant at interview.

- Candidates will be explicitly informed in the application literature that online searches will be conducted.
- These searches are conducted purely for safeguarding purposes, filtering out irrelevant personal data to ensure compliance with UK GDPR and the Equality Act.

Staff will seek to keep their personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- Work in a room where there is a glass panel in the door or leave the door open.
- Make sure that other adults visit the room occasionally.
- Avoid working in isolation with children unless necessary.
- Must not give out personal mobile phone numbers or private e-mail addresses.
- Must not give pupils lifts home in your cars without risk assessments in place.
- Must not arrange to meet them outside of school hours.
- Must not chat, befriend or follow any pupil on any social media platform.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of restrictive intervention including reasonable force and/or restraint of pupils will be carried out and documented in accordance with the relevant Positive Handling policy. If it is necessary to use physical action to prevent a child from injury to themselves or others, parents will be informed.

## Safer Recruitment

To create a safe environment for our children our academy adopts the safer recruitment procedures that help deter, reject, or identify people who might abuse children, outlined in Part 3 of Keeping Children Safe in Education. We will monitor to ensure that the policy and procedures are embedded and effective.

Our schools will ensure that at least one member of any recruitment panel has received safer recruitment training.

Our academy adheres to statutory responsibilities to check staff who work with children, making decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised.

Staff must be aware that behaviour in their personal life can compromise their position. This includes actions resulting in a loss of trust and confidence, bringing the academy and Trust into disrepute, or triggering a **transferable risk** assessment. We expect all staff to have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct to maintain confidence and respect of the public and those with whom they work.

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media, or public authorities, including about their own children, or children or adults in the community.

- Staff must immediately inform their Headteacher if their actions or personal life come under formal scrutiny from public authorities, the police, children's social care, or the media—including matters involving their own children or family network.
- The Headteacher will immediately inform the Regional CSEL and the Birmingham Diocesan Education Service Director of Education, in accordance with Protocol 4.
- Behaviour that indicates an adult poses a risk to children will result in a referral to the Teaching Regulation Agency (TRA) or the Disclosure and Barring Service (DBS) for potential barring from regulated activity.

Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within their work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another relevant regulatory body.

For all our nurseries and primary schools, The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria set out in the regulations.

For example,

- an individual will be disqualified where they have committed a relevant offence against a child
- been subject to a specified order relating to the care of a child
- committed certain serious sexual or physical offences against an adult
- been included on the DBS children's barred list
- been made subject to a disqualification order by the court
- previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled.

A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare.

We understand that schools are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.

Within our academy, all shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children e.g.

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Whether they are prohibited from taking part in the management of an independent school
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
- If they are known to the police and children's social care
- Have they been disqualified from providing childcare
- Any relevant overseas information

In addition, as part of the shortlisting process we will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will inform shortlisted candidates that online searches will be completed as part of due diligence checks.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad will be conditional on satisfactory completion of the necessary pre-employment checks and satisfactory references.

Upon appointment of new staff our academy will:

- Verify a candidate's identity. Best practice is to check the birth certificate, where this is available
- Obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- Verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, we will follow advice on the GOV.UK website
- if the person has lived or worked outside the UK, further overseas checks may be made
- Verify professional qualifications, as appropriate; we will use The Teacher Services' system to verify any award of qualified teacher status (QTS) and the completion of teacher induction and probation
- Check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State.
- Check that the candidate is not disqualified under the Childcare Act 2006 (2018 regulations) where relevant
- Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 and will not be kept by the school.

These checks are part of a wider safeguarding regime which will carry on following appointments.

The Single Central Record covers the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school including as part of the Executive Team
- Volunteers
- Governors
- Agency, third-party staff, and contractors who have regular contact with the school.

The following information will be recorded on the Single Central Record:

- An identity check
- A standalone children's barred list check.
- An enhanced DBS with certificate number
- Prohibition from teaching check
- A section 128 check
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications, where required
- A check to establish the person's right to work in the United Kingdom.

The SCR will indicate the date when each check listed above was completed (or certificate obtained) and who by.

Our schools will obtain written confirmation that the employment business supplying staff has carried out the relevant checks and obtained the appropriate certificates. Our schools will also check that the person presenting themselves for work is the same person on whom the checks have been made (Identity check)

We will obtain written confirmation from alternative providers we use to confirm they have undertaken the relevant pre-employment and DBS checks for their staff. Quality assurance checks and visits will be completed.

All applicants MUST show their current original DBS certificate to the relevant school as soon as they take up post. These will not be kept by the school once recorded on the SCR.

## Safeguarding Concerns and Allegations made about Staff, including Supply Teachers, Volunteers and Contractors

It is important that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member.

Our schools work in accordance with the SGtACMAT Managing Allegations Policy.

Our policy complies with the guidance set out in Part 4 of Keeping Children Safe in Education.

All allegations of abuse, neglect, or inappropriate behaviour carried out by any staff member, volunteer, supply teacher, trainee teacher or contractor will be treated with the utmost urgency and seriousness.

When a concern or allegation is raised regarding any adult working within our school, the Headteacher (or Chair of Governors if the allegation is against the Headteacher) must immediately assess if the behaviour meets the Harm Threshold. This applies if an adult has:

1. Behaved in a way that has harmed a child, or may have harmed a child;
2. Possibly committed a criminal offense against or related to a child;
3. Behaved towards a child or children in a way that indicates they would pose a risk of harm to children; or

4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour in their personal life/transferable risk).

If an allegation is made against a member of staff, trainee teacher, volunteer or supply staff, the school's headteacher must be informed immediately or as soon as possible within one working day. If the harm threshold is met, or there is any doubt whatsoever, the Headteacher must contact the Local Authority Designated Officer (LADO) immediately, and within one working day (24 hours). Staff must not conduct internal investigations or interview witnesses prior to consulting the LADO.

- Allegations regarding a member of staff's own actions or conduct must be reported to the Principal via self-referral.
- Allegations regarding a member of staff in the central team will be reported to the COPO who will be supported by the Trust Safeguarding Lead.
- Allegations regarding the COPO or Trust Safeguarding Lead will be reported to the CEO.
- Allegations against the CEO will be reported directly to the Chair of the Board of Directors.
- Allegations regarding the Principal will be reported to the Chair of Governors, CSEL, and Trust Safeguarding Lead who will advise the CEO and COPO (Chief Operating People Officer).
- Allegations regarding the Principal will be reported directly to the LADO via the COPO.

If the allegation concerns the Headteacher, the reporting staff member must bypass school leadership and contact the Chair of Governors, CSEL, and Trust Safeguarding Lead who will advise the CEO and COPO (Chief Operating People Officer)

Allegations regarding the Principal will be reported directly to the LADO via the COPO. They will fulfill the duty to notify the LADO within 24 hours, alongside informing the Trust Safeguarding Lead, Regional CSEL and Birmingham DES Director of Education in line with Protocol 4.

**I**f an allegation arises regarding an independent organisation or individual using school premises to run activities for children, the school will apply these identical safeguarding procedures, including the mandatory 24-hour notification to the LADO.

When considering an allegation against an individual not directly employed by our academy, where our disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business, whilst our academy is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will our schools decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome.

Our procedures and approach to dealing with allegations will be applied with sensitivity and common sense. Our academy will exercise its duty of care to employees, we will act appropriately to manage and minimise the stress inherent in the allegation process. Our

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

We may receive an allegation relating to an incident that happened when an individual or organisation were using our school premises for the purposes of running activities for children. As with any safeguarding allegation, we will follow our safeguarding policies and procedures, including informing the LADO.

Low-Level Concerns

To foster an open, transparent, and preventative safeguarding culture, our academy operates a robust Low-Level Concerns Framework in line with Part 4 of KCSIE. This structure ensures that minor or ambiguous behaviours are captured early, preventing the escalation of risk. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers, or contractors) that does not meet the harm threshold, then this should be shared with the Headteacher.

We create a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral.

A low-level concern is any concern—no matter how small, and even if apparently insignificant—that an adult working in or on behalf of the school may have acted in a manner that is inconsistent with the staff code of conduct, but does not meet the statutory harm threshold for a LADO referral.

Examples of low-level concerns include, but are not limited to:

- Being overly friendly, informal, or familiar with children;
- Having favourites or demonstrating preferential treatment;
- Taking photographs of children on personal mobile devices contrary to school policy;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without operational justification;
- Using humiliating, sarcastic, or inappropriate language with pupils.

Low-level concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or because of vetting checks undertaken. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately.

All low-level concerns will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records will be retained by the headteacher and will be reviewed regularly so that potential patterns of concerning behaviour can be identified.

Should the level of concern reach the harm threshold, the case will be referred to the LADO. Records will be retained until the individual ceases to be employed by this school.

For references we should only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

These records are held securely and confidentially by the Headteacher. They are reviewed regularly to identify potential patterns of cumulative or escalating behaviour. If a pattern emerges that satisfies the harm threshold, the case will be escalated immediately to the LADO.

Low-level concern records will be retained at least until the individual ceases to be employed by the school.

## Whistleblowing

All staff, volunteers, and parents should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime, and such concerns will be taken seriously. Our academy has adopted the CES Whistleblowing Policy and appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised.

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

The NSPCC whistleblowing helpline – What you can do to report abuse is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

## Curriculum and Online Safety

Child safety issues and child protection will be addressed through the curriculum where appropriate, especially through PSHE, Computing and Online Safety, Citizenship, Relationship and Sex Education (RSE,) Health Education and British values.

School is likely to be in regular contact with parents and carers. Those communications will be used to reinforce the importance of children being safe online, and parents and carers are likely to find it helpful to understand what systems we use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be required to access and be clear who from their school (if anyone) their child is going to be interacting with online.

We use a variety of resources and approaches to teach the children how to keep themselves safe, build their resilience and manage risks.

The curriculum (personal, social and health education) development strand of the curriculum, includes an emphasis on relationships (relationships and sex education), building confidence and resilience in pupils and in developing preventative strategies to ensure their own protection and that of others. Opportunities are provided for pupils to develop the skills and strategies they need to stay safe from abuse, including age-appropriate discussions about healthy relationships, their bodies and being able to say no to requests that they do not want to carry out.

Clear advice and guidance are built into the curriculum to ensure that pupils understand that there is a range of contacts they can turn to for advice and support and that they know where and how to report abuse.

Our school teaches the children how to keep themselves safe through avenues such as:

- Safe-side visit
- Cycling Proficiency
- Swimming lessons
- Educational Visits
- Police – Talks on Bullying, Cyber-bullying, Stranger Danger, Firework and Park Safety
- People Who Help Us Topics
- PSHE/ Assemblies
- RSE/ School Nurses
- British Values/ Virtues and Values
- NSPCC workshops
- PANTS campaign
- Base 25/Catch 22 etc
- Thrive Programme

## Online Safety Curriculum and Computing, Use of mobile Technology

The growth of different electronic media in everyday life and an ever-developing variety of devices including PCs, laptops, mobile phones, webcams etc. place an additional risk on our children. Internet chat rooms, discussion forums, social networks, online gaming, and the ability to live stream can all be used as a means of contacting children and young people with a view of grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases, arrange to meet them.

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with pupils.

Pupils can engage in or be a target of cyber-bullying using a range of methods including text, sexting, and instant messaging to reach their target. Mobile phones are also used to capture violent assaults and inappropriate images or other pupils for circulation (e.g. happy slapping/sexting).

We will make pupils aware of the dangers through age-appropriate curriculum teaching particularly computing and IT lessons, Online Safety curriculum, PSHE and RSE. We will refer to several approved teaching resources such as Project Evolve and CEOP Education Programme to support our online safety teaching.

We will use appropriate external providers where possible to support our teaching of online safety.

Our academy ensures:

- Software (filters, firewalls, and monitoring) are in place to minimise access and to highlight any person or child accessing inappropriate sites or information

- Pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns, the DSL will be informed immediately)
- Pupils are taught not to give out personal details, phone numbers, schools, home address, computer passwords etc
- Pupils should adhere to the policy on mobile devices including phones, smart watches and any other mobile device that can capture and share images or be used for the internet
- All staff receive online safety training
- We will review the Online Safety policy annually
- We treat all online safety concerns seriously, including those which may involve the use of AI (Artificial Intelligence)

The police will be involved, and advice will be sought from CEOP if required if there is any criminal element to misuse of the internet, phones, or any other form of electronic media.

**Use Of Mobile Phones, Cameras, And Other Technology Devices**

We recognise that many aspects of the curriculum can be enhanced using multi-media and that there are now a wide and growing range of devices on which this can be accomplished. Digital images, video and sound recording are only taken with the permission of participants; images and video are of appropriate activities and are only taken of children wearing appropriate dress. Full names of participants are not used either within the resource itself, within the filename or in accompanying text online.

All parents & visitors are asked not to use mobile devices when visiting our school and to take any calls or texts outside of the building. All staff must be vigilant and remind any parents/visitors who forget.

We ask all parents/carers to sign an agreement about taking and publishing photographs and videos of their children and this list is checked whenever an activity is being photographed or filmed.

For their own protection, staff or other visitors should never use a personal device (mobile phone, digital camera, smart watch, or digital video recorder, etc.) that can capture and share images or audio clips of pupils.

Academy mobile phones, i-pads, or similar devices with communications facilities used for curriculum activities are set up appropriately for the activity. Pupils are taught to use them responsibly.

## Consensual And Non-Consensual Sharing Of Images

We know and understand that sharing photos and videos online is part of daily life for many pupils, enabling them to share their experiences, connect with friends and record their lives.

The increase in the speed and ease of sharing imagery has brought concerns about pupils producing and sharing sexual imagery of themselves, now with added risks associated with using AI platforms and software. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying, sexual harassment, and increased vulnerability to sexual exploitation.

Although the production of such imagery will likely take place outside of school, these issues often manifest in schools and organisations working with children and young people. Our

academy will respond swiftly and confidently to ensure that pupils are safeguarded, supported, and educated. **Producing and sharing sexual images of under-18s is also illegal.**

Our academy will deal with all incidents, including those where AI has been used, as a safeguarding concern. We will be guided by the principle of proportionality and our primary concern will be the welfare and protection of the pupils involved. We may respond to incidents without involving the police in accordance with national guidelines.

When an allegation involves the possession, generation, or distribution of Child Sexual Abuse Material (CSAM) or Child Sexual Exploitation and Abuse (CSAE) material (including synthetic or AI-generated media), staff must strictly follow this protocol:

1. Do not view, copy, download, print, or forward the image or media file under any circumstances. Viewing or distributing the file can constitute a criminal offence.
2. Securely isolate the physical device (smartphone, tablet, or laptop). Ensure it is turned off, disconnected from network Wi-Fi or cellular connections to prevent remote deletion, and placed in a secure, locked location managed exclusively by the DSL.
3. The DSL will log the incident on CPOMs without uploading, pasting, or describing the specific visual characteristics of the illicit image. The log must focus purely on the timeline, names of involved parties, and the physical location of the isolated device.
4. The DSL will immediately contact the local Police and the Children's Social Care Multi-Agency Safeguarding Hub (MASH) or Integrated Font Door (IFD). Staff must not conduct independent investigations or interrogate pupils until law enforcement has established clear parameters.

## Safeguarding and Generative Artificial Intelligence (AI)

The academy recognises that while Generative AI tools offer significant educational opportunities, they present distinct safeguarding risks that all staff must actively manage.

- Staff must remain vigilant against the creation, distribution, or manipulation of synthetic media, including deepfakes or AI-generated sexual imagery (synthetic CSAM). Any instance where a pupil creates, shares, or requests harmful AI-generated content will be handled with the same severity as physical abuse material, following the academy's Child-on-Child abuse framework and statutory referral pathways.
- Pupils and staff are strictly prohibited from uploading identifiable personal data, confidential school information, or safeguarding disclosures into public or unapproved third-party AI platforms. Commercial generative models often retain input data for algorithm training, creating significant data exploitation and privacy risks under the UK GDPR.
- Schools must educate pupils on the risks of algorithmic bias, misinformation, and the manipulation of truth by generative engines. The computing and RSE curriculum must explicitly teach pupils how to critically evaluate AI outputs, identify automated grooming behaviours, and understand the legal implications of generating non-consensual synthetic media.

## Prevent (Preventing Radicalisation)

Children may be susceptible to radicalisation into terrorism. Like protecting children from other forms of harms and abuse, protecting children from this risk will be a part of our safeguarding approach.

The aim of PREVENT is to stop people from becoming terrorists or supporting terrorism. PREVENT also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

**Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or,
- undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2*)*

**Radicalisation** This is the process by which individuals adopt extremist ideologies and potentially engage in or support terrorism.

**Terrorism** is the use or threat of serious violence against a person or serious damage to property, designed to influence the government or intimidate the public, and for the purpose of advancing a political, religious, racial, or ideological cause.

https://www.gov.uk/government/publications/prevent-duty-guidance/glossary-of-terms

We understand there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding leads (or deputies) making a PREVENT referral to the Channel programme.

From 1 July 2015 we have had "due regard" to the need to prevent people from becoming terrorists or supporting terrorism". **This duty is known as the PREVENT duty**.

We will:

- Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology
- Work in partnership with parents, children, families, and statutory agencies
- Assess the risk in our local area and as a minimum all staff will undertake PREVENT awareness training to upskill them on protecting children from the risk of radicalisation
- Our DSLs/DDSLs will complete training for Channel referrals
- Our trust will hold a PREVENT risk assessment/Action plan (in line with the Prevent Duty guidance 2023), which will be reviewed annually
- Ensure that suitable filtering and monitoring is in place on all devices in our setting (both staff and pupil devices), including those we may loan for home use. Our pupils are taught to stay safe online which is integral to the curriculum.

We aim to build the children's resilience to radicalisation by providing a safe environment and through aspects of the curriculum including SMSC, British Values, PSHE, RSE and Citizenship.

All of our schools have a Prevent Risk Assessment in place, in line with DfE guidance.

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. PREVENT referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Our DSLs/DDSLs understand when it is appropriate to make a referral to the Channel programme.

All of our schools have a PREVENT Risk Assessment in place, in line with DfE guidance.

**Algorithm-Driven and Online Radicalisation Risks**

Modern radicalisation risks heavily leverage online space, automated algorithmic amplification, and encrypted communication platforms.

- Staff must look out for pupils who show sudden changes in behaviour due to algorithmic pipelines. These pipelines can quickly guide a user from mainstream content to extreme, fringe ideologies, including Extreme Right-Wing extremism, Islamist radicalisation, and Incel/misogynistic subcultures.
- Each school must update its local Prevent Risk Assessment annually. This assessment must account for the school's digital infrastructure, filtering alert profiles, and local multi-agency threat assessments.
- Where a pupil shows vulnerability to radicalisation, the DSL will use local multi-agency pathways to make a prompt Channel referral. This action does not require criminal behaviour to have occurred; it is an early-intervention protective mechanism

**Standard Tier Public Protection Procedures (Martyn's Law)**

Holy Name Catholic Primary School maintain, evaluate, and regularly test site-specific emergency response procedures designed to reduce harm from potential terrorist actions or extreme security breaches. These plans must explicitly cover four distinct actions:

- Evacuation: Protocols for safely clearing out all staff, pupils, and visitors from buildings to a designated off-site safe assembly point.
- Invacuation: Explicit operational procedures for moving individuals from exposed external boundaries, playgrounds, or transparent structures into secure, fortified internal safe zones.
- Lockdown: Procedures for securing the physical perimeter, locking individual classrooms, shutting down public access points, and maintaining silence to protect against an active on-site intruder.
- Communication: Real-time internal alerting mechanism capable of notifying staff, pupils, and visitors of the exact nature of the threat, including clear instruction paths for supply staff, temporary volunteers, or external visitors who lack long-term spatial knowledge of the building layout.

Schools must have distinct risk assessments for calendar events (e.g., parents' evenings, theatrical productions, sports fixtures) which are open to the public or pupil only events. These assessments must ensure reduced staff-to-visitor ratios are mitigated, and that temporary visitors receive a baseline safety briefing upon entering the site

## Cybercrime

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

Children with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding leads (or a deputies), will consider referring into the Cyber Choices programme.

Our academy takes cyber security seriously and ensures that we meet the required DFE cyber security standards for schools. All staff have appropriate training in cyber security.

## Types and Indicators of Abuse and Neglect

All staff are familiar with the types and indicators of abuse. They are aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All will understand that children can be at risk of harm inside and outside of home and online. They will exercise professional curiosity and know what to look for to identify abuse and neglect early.

All staff are expected to be always vigilant and recognise indicators for the categories of abuse and neglect:

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

**Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Contextual Safeguarding

We know that safeguarding incidents and/or behaviours can be associated with factors outside of school and/or can occur between children outside of school. All staff, but especially the designated safeguarding leads (or deputies) will consider the context within which such incidents and/or behaviours occur, and actively track localised community risks including online spaces to identify whether wider environmental factors and online spaces are present in a child's life that are a threat to their safety and/or welfare. This is known as contextual safeguarding, which simply means assessments of children will consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Our DSLs/deputy DSLs will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Children's social care assessments should consider such factors, therefore we will provide as much information as possible as part of the referral process, which may include completing an Exploitation Screening Tool. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## Child Sexual Exploitation (CSE)

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.
Like all forms of child sexual abuse, child sexual exploitation:

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

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

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

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity
- Neurodivergence

We understand that not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present.

Children rarely self-report child sexual exploitation so all staff are aware of the possible signs of child sexual exploitation. Our staff will report any concerns regarding children at risk of CSE to the designated safeguarding leads or deputies who will then make a referral and liaise with other relevant statutory agencies, for example, exploitation hub, police, and health professionals as required. An exploitation screening tool will be completed if appropriate to support a referral for external support.

## Child Criminal Exploitation (CCE) and County Lines

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur by technology including encrypted messaging apps and online gaming platforms. . CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late.
- children who are regularly absent from school.

- children with unexplained bank account activity, multiple new bank cards, or involvement in "money muling" schemes

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money.
Like other forms of abuse and exploitation, county lines exploitation:

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

Our staff are aware of indicators to look for with our pupils for the possible involvement of County Lines. All concerns will be reported to the DSLs/DDSLs following the safeguarding reporting and recording procedures. We will notify police as necessary through the local intelligence sharing channels and complete an exploitation screening tool if appropriate.

## Child-on-Child Abuse

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in schools and other children.

We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's relevant policy e.g. behaviour policy.

All staff recognise that children can abuse their peers and that it can happen inside and outside of school or online. All staff understand the policy and procedures regarding child-on-child abuse and the important role they must play in preventing it and responding where they believe a child may be at risk from it.

All allegations will be taken seriously as we understand that abuse is abuse and should never be passed off as "banter", "just having a laugh" or "part of growing up". We have a zero-tolerance approach to this behaviour. All allegations will be carefully considered, and all decisions will be made on a case-by-case basis in consultations with social care.
Referrals under safeguarding arrangements may be necessary, key specific considerations will include:

- The age, maturity and understanding of the children; and
- Any disability or special needs of the children

Child-on-child is most likely to include, but not limited to;

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

<u>Prevention, Assessing and Minimising the Risks</u>
We will minimise the risk of allegations against other children by:

- Providing a developmentally age-appropriate PSHE, RSE, British Values curriculum which develops children's understanding of acceptable behaviour and keeping themselves safe
- Having clear systems in place for any child to raise concerns with staff, knowing that they will be taken seriously
- Delivering targeted work on assertiveness, protective behaviours and keeping safe those children identified as being at risk
- Developing robust risk assessments & providing targeted work for children identified as being a potential risk to other children
- Training and awareness sessions will be provided for staff

<u>Procedure to Manage and Record Child-On-Child Allegations</u>

- A factual record will be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
- The designated safeguarding lead or deputies will contact social care/multi-agency agency safeguarding hub (MASH) to discuss the allegation and seek advice
- If the allegation indicates that a potential criminal offence has taken place, this will be referred to the multi-agency agency safeguarding hub MASH / Social Care ERT where the police will become involved
- Following advice from Social Care and/or the police, parents of both the child being complained about and the alleged victim, should be informed and kept updated on the progress of the referral
- The designated safeguarding lead or deputies will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files
- It may be appropriate to exclude the pupil being complained about for a period according to the school's behaviour policy and procedures
- Where statutory agencies (Social Care/Police) conclude that the threshold for external intervention is not met, the DSL/academy will conduct an internal safeguarding investigation. Decisions regarding sanctions or support will be made on the balance of

probabilities, ensuring risk assessments and safety plans are established regardless of criminal outcomes
- In situations where the individual school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative supervision plan

We recognise and understand that child-on child allegations will be very distressing situations for all concerned – the victim, perpetrator, other children, family members and staff. We will seek to provide any support required and make any necessary referrals for counselling and support services.

## Safeguarding Protocol: Gender Questioning Children

The academy approaches queries surrounding gender identity firmly within a statutory safeguarding context, in strict accordance with the updated KCSIE guidance. A child questioning their gender must be supported holistically, prioritising their physical safety, psychological wellbeing, and the overarching best interests of both the individual child and the wider school community. Staff must recognise that childhood and adolescence are periods of significant developmental change; exploration may occur, and social transition must never be viewed as a simple or default solution to underlying distress.

Under no circumstances will any member of staff initiate conversations or suggest paths toward social transition to a pupil. Furthermore, informal, ad hoc, or unrecorded accommodations are strictly prohibited. Staff cannot informally agree to use alternative names or preferred pronouns outside of the formal, documented academy decision-making pathway. If a child confides in a member of staff regarding their feelings but makes no request for operational changes, the conversation may remain confidential unless a specific safeguarding vulnerability or risk of harm is identified. If a formal operational change is requested, it must be referred immediately to the Designated Safeguarding Lead (DSL).

When a formal request for social transition (e.g., change of name, pronouns, or uniform) is raised by a pupil or parent, the school will activate a formal review process managed by the DSL and Headteacher:

- The DSL will open a structured safeguarding log to analyse the request, taking into account underlying factors including neurodiversity, special educational needs (SEN), and mental health concerns, while working alongside the SENCO where appropriate.

- Parents and carers play a primary statutory role in their children's lives. We will engage parents as a matter of priority, treating their views with significant weight. The academy will offer supportive collaborative mediation (e.g., staff presence during family discussions).

- Parental involvement will only be withheld if the DSL has clear, evidence-based grounds to believe that notifying the parents would expose the child to a direct risk of significant harm. This exception must be fully documented, contemporaneously logged, and will typically trigger an immediate referral to Children's Social Care (MASH).

- To comply with fundamental safeguarding duties and the integrity of single-sex provisions, the following absolute operational rules apply across our academy, with no exceptions permitted for social transition requests:

– Toilets: Pupils are strictly prohibited from entering toilets designated for the opposite biological sex. Separate toilets must remain available for boys and girls aged eight and over.

- Changing Rooms & Showers: Pupils aged 11 or older are strictly prohibited from undressing or showering in front of peers of the opposite biological sex.
- Alternative Accommodations: If a child does not wish to use facilities designated for their biological sex, the academy will consider providing alternative, completely self-contained individual facilities (e.g., a single-occupancy accessible toilet or single-stall changing space). These adjustments must be structured so they do not reduce, compromise, or undermine the privacy, safety, and comfort of other pupils utilising the standard single-sex spaces.
- Overnight Residential Accommodation: Pupils are strictly prohibited from sharing overnight or boarding accommodation with peers of the opposite biological sex during educational visits or trips.
- Sports: Where sports or physical education activities are segregated or organized on the grounds of physical safety, competitive fairness, or biological equity, no exceptions will be granted under a social transition request.

Our academy are legally required to record a child's biological sex accurately within their central management information systems (MIS) and single central records. The school's official documentation must always preserve accurate biological sex tracking. Where a child has fully transitioned outside of the school context and is living in stealth (where peers or certain staff are unaware of their biological sex), the DSL must retain secure, restricted access to the true biological records to safely manage ongoing operational risks, facilities allocation, and emergency medical profiles.

Training on handling student disclosures regarding gender identity, specifically emphasising the strict prohibition against unilateral or informal staff adjustments, and reinforcing the mandatory referral route directly to the DSL

## Child-On-Child Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

We take a zero-tolerance approach and any inappropriate behaviour will be addressed even if it appears to be relatively innocuous. All victims will be taken seriously and offered appropriate support. We know that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff are aware and know the importance of:

- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts.

<u>Sexual Violence</u>

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003.

Sexual Harassment

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. For this policy, reference to sexual harassment is in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or making them feel intimidated, degraded, or humiliated and/or creating a hostile, offensive or sexualised environment.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

When considering HSB, both ages and the stages of development of the children are critical factors. The designated safeguarding lead (and their deputies) have a good understanding of HSB. This will form part of their safeguarding training. Our DSLs/DDSLs will seek support as necessary from external agencies and MASH24.

Our DSLs/DDSLs will have access to the Brook Traffic Light training and toolkit to support concerns regarding HSB. Access to bespoke support can be sought through referrals into MASH in line with LA Multi-agency guidance for Harmful Sexual Behaviour, where pupils display behaviours that are a significant cause for concern in line with the Brook guidance.

Our Response to a Report of Sexual Violence or Sexual Harassment

Our academy will follow the guidance set out in Part 5 Keeping Children Safe in Education.

Considering Confidentiality and Anonymity

We will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask us not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

Risk Assessment

If we receive a report of sexual violence or harassment, the designated safeguarding leads or deputies will make an immediate risk and needs assessment. This will be considered on a case-by case basis.

Our risk and needs assessment will consider:

- the victim, especially their protection and support
- whether there have been other victims
- the alleged perpetrator

- all the other children (and, if appropriate, adult students and staff), especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms
- The time and location of the incident, and any action required to make the location safer

Actions to Consider Following a Report of Sexual Violence and/or Sexual Harassment

The starting point regarding any report made is that there is a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated. All our staff working with children are advised to maintain an attitude of '**it could happen here'**.

Following a report of sexual violence and/or harassment we will consider:

- the wishes of the victim in terms of how they want to proceed (in an age-appropriate way.)
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forma of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school staff; and
- other related issues and wider context e.g. contextual safeguarding, any links to CSE and CCE

Considering Bail conditions

We will have due regard for the information available in KCSiE Part 5.

Careful liaison with the police should help to develop a balanced set of arrangements.

Safeguarding and Supporting the Victim

We will do everything we reasonably can to protect the victim from bullying and harassment because of any report they have made.

Whilst the victim will be given all the necessary support to remain in school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education.

If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs. The designated safeguarding leads will take responsibility to ensure this happens (and should discuss with the victim and, where appropriate, their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Working with parents and carers

We will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and this will be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk.

Safeguarding Other Children

Our approach to safeguarding: a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

We will keep our policies, processes, and curriculum under constant review to protect all their children.

## Domestic Abuse

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

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). These can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

Our staff will support any pupil who has experienced direct or indirect exposure to domestic abuse.

## Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day.

Our academy is part of Operation Encompass and pupils and families are supported appropriately.

## Children Absent from Education

Staff are aware that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including

neglect, child sexual and child criminal exploitation - particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called honour-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. This includes when problems are first emerging, but also where children are already known to children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Our schools have an admission register and an attendance register. All pupils are placed on these registers at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend school. If the child fails to attend on the agreed or notified date, we will notify the local authority at the earliest possible opportunity to prevent the child from going missing.

Our attendance and admission registers are kept up-to-date. We actively encourage our parents and carers to inform us of any changes whenever they occur.

We monitor attendance regularly and address any issues that may cause concern and where attendance fails to meet the expected level in line with our attendance policy. We follow guidance set out in Working Together To Improve School Attendance (July 2026) and in partnership with local authorities we will:

- **Expect** high standards of attendance for all pupils
- **Monitor** attendance rigorously
- **Listen and Understand** barriers to attendance and agree how to resolve them
- **Facilitate support** to ensure all barriers are removed which may be outside the school setting
- **Formalise support** when necessary, through attendance contracts
- **Enforce** attendance through statutory intervention when appropriate

We will notify the local authority of any child who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more at such intervals as are agreed by schools and local authorities. We will engage with the Education Welfare Officer when concerned about a pupil's attendance.

## Private Fostering Arrangements

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18 if disabled) who is cared for by someone who is not their parent or a close relative. This is a private arrangement made between a parent and a carer for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles, or aunts, (whether of full blood, half blood, or marriage/ affinity.)

Staff will notify the designated safeguarding lead or deputies when they become aware of private fostering arrangements. The designated safeguarding lead or deputies will speak to the family of the child involved to check that they are aware of their duty to inform the LA.

## Honour-based Abuse

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

If our staff have any concerns regarding a child that might be at risk of HBA or who has suffered from HBA they will speak to their designated safeguarding lead or deputies. As appropriate, the designated safeguarding lead or deputies will activate the local safeguarding procedures by contacting the police and or social care.

## Female Genital Mutilation (FGM)

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

ALL staff will speak to the designated safeguarding lead or deputies about any concerns about female genital mutilation. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions.

**Teachers must personally report to the police** cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also discuss any such case with their designated safeguarding lead or deputies who will support the reporting process to the police with the individual teacher and involve children's social care as appropriate.

## Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used.

School staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk.

## Breast Ironing/Flattening

Breast flattening, also known as breast ironing, is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period (ranging from a few weeks to years) for the breasts to disappear or delay the development of the breasts entirely. Breast flattening usually starts with the first signs of puberty, it is usually carried out by female relatives.

It should also be acknowledged that some adolescent girls and boys may choose to bind their breasts using constrictive material due to gender transformation or questioning their identity, and this may also cause health problems.

There are no specific laws in the UK regarding breast flattening. If a member of staff is concerned about this practice being committed on a child, they will immediately inform the DSLs/DDSLs who will contact MASH for further support.

## Up-Skirting

The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. Up-skirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

This act will not be tolerated and all reports will be taken seriously. The DSLs/DDSLs will follow safeguarding protocols and refer to the behaviour policy as necessary.

## Serious Violence

All staff are aware of indicators which may signal that children are at risk from or involved with serious violent crime. These may include:

increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries, unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
The likelihood of involvement in serious violence may be increased by factors such as:
- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery

Staff are aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

## Children and the Court System

Children are sometimes required to give evidence in criminal courts either for crimes committed against them or for crimes they have witnessed.

We will use the age-appropriate guides to support children, 5-11 year olds and 12-17 year olds. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. We will use the Ministry of Justice online child arrangements information tool to support this process and will make this information available to parents and carers if they require our assistance.

## Children with Family Members in Prison

Some children may have a parent who has been sent to prison or in custody. We will utilise the information NICCO provides designed to support professionals working with offenders and their children to help mitigate negative consequences for those children.

## Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We understand only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
Common warning signs of mental health issues include:

- sudden mood and behaviour changes
- self-harming
- suicidal thoughts
- unexplained physical changes, such as weight loss or gain
- sudden poor academic behaviour or performance
- sleeping problems
- changes in social habits, such as withdrawal or avoidance of friends and family

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Our staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance, and progress at school.

If any staff member has a mental health concern about a child that is also a safeguarding concern, immediate action will be taken in line with this policy and they will speak to the designated safeguarding leads or a deputy immediately.

We support our children with mental health and wellbeing through the PSHE curriculum. Staff will ensure all children are aware of strategies to support their own wellbeing and that of their peers. We foster a culture of open communication, empathy, and respect where children feel comfortable seeking help. We will always balance the need for confidentiality with the need to safeguard our children, ensuring that information is shared appropriately with relevant professionals. We are mindful of cultural and religious beliefs that may impact attitudes towards suicide and mental health.

We have appropriate mental health trained staff who will offer appropriate support to our children with all mental health concerns and involve external agencies such as Mental Health Support Team, School Nurse services, CAMHS, Base 25, MASH24, as necessary. Staff will also signpost children to mental health support services.

If a child discloses suicidal thoughts to a member of staff, we will immediately contact social care/relevant support and the parent/carer. If we feel the child is in immediate danger, we may call 999.

If one of our schools is involved with any critical incident, all pupils and staff will receive appropriate support through Birmingham Diocesan Education Service, the LA Education

Psychology Service and other relevant professionals. Support for parents and the local community will also be provided where necessary.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. When required, our designated safeguarding lead or deputies will obtain contact details and know referral routes into their Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Our staff will consider homelessness in the context of children who live with their families and intervention will be on that basis.

## Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs (organ harvesting).

Our staff are aware of the signs of someone who might be a victim of modern slavery, the support available to victims and how to refer them to the NRM.

## Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known, but not related to the victim (such as neighbours, friends, and acquaintances) and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

We teach children about community safety through our PSHE, Personal Development and RSE curriculum. We use external partners such as the police to support with key messages.

## Monitoring Policy and Practice

Our safeguarding policy and procedures will be reviewed annually or sooner if required. All staff and stakeholders may contribute to the development of our policies and procedures.

Our policy will be published on our website and paper copies are available upon request.

| Version | Date | Action/Notes | Signature of the Chair of Committee/Board |
|---|---|---|---|
| 1 | 18/9/25 | Approved by Board of Directors | *J Bridgewater* |
| 2 | | | |

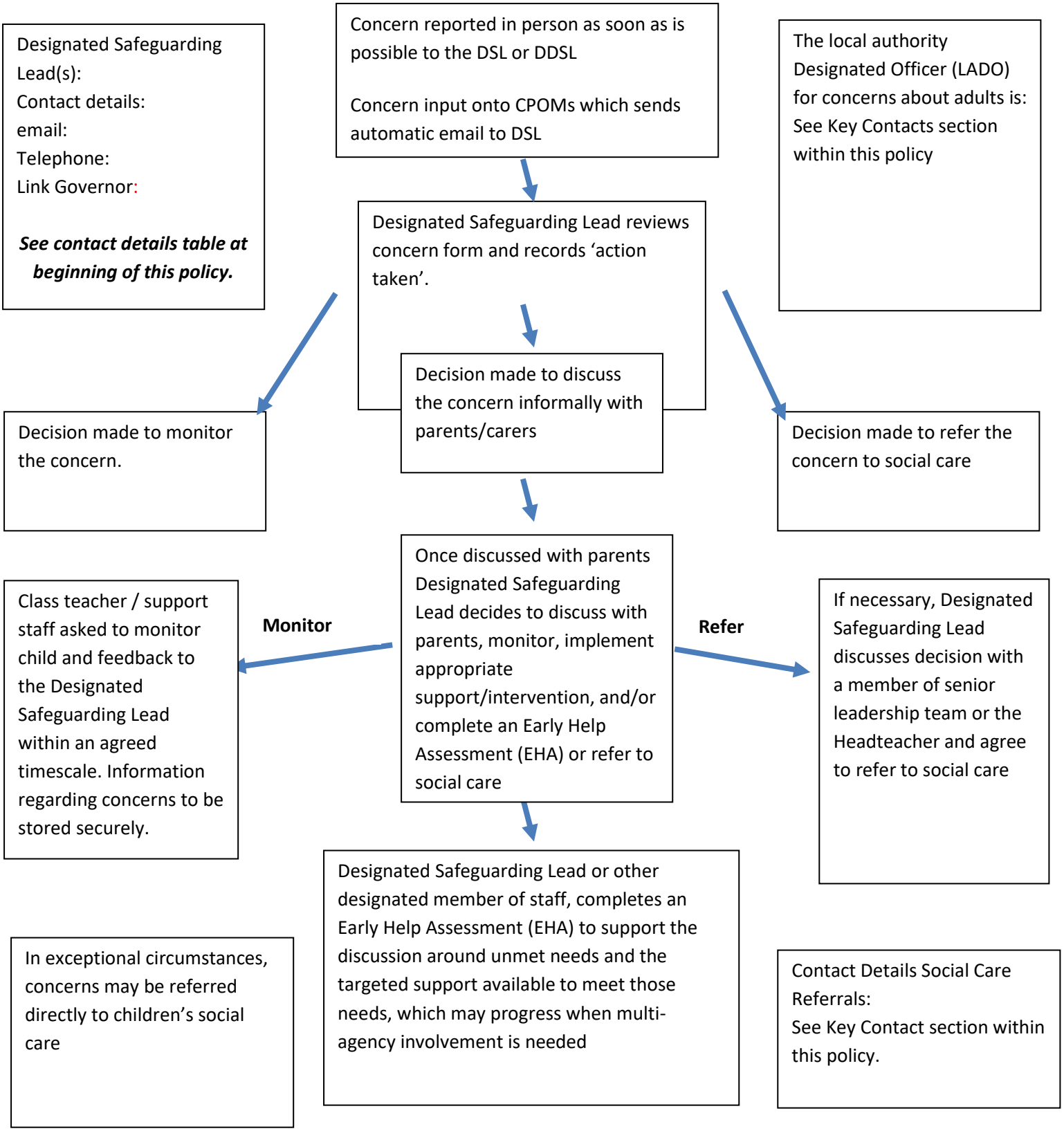
# Appendix A Actions if there is a concern about a child (KCSIE 2026)

## A flowchart setting out the actions taken where there are concerns about a child

Figure 1



# Appendix B Flow chart for raising safeguarding concerns about a child



# Appendix C Police and Criminal Evidence Act (1984) – Code C:

1. The headteacher, designated safeguarding lead (DSL) and deputy (DDSL) are aware of the requirement for children to have an appropriate adult when in contact with police officers.

2. PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.

3. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

4. If a police officer arrives at the academy wishing to speak with a pupil, the receptionist will inform the headteacher/ principal and the DSL and follow the visitor's policy. The DSL will ensure that arrangements are made to inform parents that this is the case and seek their presence at the academy as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the DSL or Principal will ensure that an appropriate adult is provided from the academy leadership team.

5. The DSL (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on our online safeguarding system.

6. If, having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.

7. A person whom there are grounds to suspect of an offence must be cautioned before questioned about an offence, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

8. A police officer must not caution a child or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

9. The 'appropriate adult' means, in the case of a child:

- the parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- a social worker of a local authority or, failing these, some other responsible adult aged 18 or over who is not:
    - a police officer;
    - employed by the police
    - under the direction or control of the chief officer of a police force; or

- a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.



With St Gabriel we promise to **walk with, not past**. We will help, we will listen, we will bring hope and speak for the vulnerable

# Appendix D Seven Golden Rules of Information Sharing

The seven golden rules for sharing information (including personal information):

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support and only share the information they need to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share

information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. **Record the reasons for your information sharing decision, irrespective of whether you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.



With St Gabriel we promise to **walk with, not past**. We will help, we will listen, we will bring hope and speak for the vulnerable

# Appendix E

# Further Advice on Child Protection is Available on:

(This is not an exhaustive list)

- Ask AVA- The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.
- NSPCC – Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.
- NSPCC - Resources which help adults respond to children disclosing abuse.
- NSPCC also provides free and independent advice about HSB: NSPCC - Harmful sexual
- behaviour framework
- Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire -
- Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent,
- identify early and respond appropriately to peer-on-peer abuse.
- Contextual Safeguarding Network – self-assessment toolkit for schools to assess their own
- response to HSB.
- Childnet - STAR SEND Toolkit equips, enables and empowers educators with the
- knowledge to support young people with special educational needs and disabilities.
- Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed
- to explore problematic online sexual behaviour with 9-12 year olds.
- Childnet -Step Up, Speak Up a practical campaign toolkit that addresses the issue of online
- sexual harassment amongst young people aged 13-17 years old.
- NSPCC - Harmful sexual behaviour framework an evidence-informed framework for
- children and young people displaying HSB.
- Contextual Safeguarding Network – Beyond Referrals -Schools leavers for addressing HSB
- in schools.
- Farrer & Co: Addressing child on child abuse: a resource for schools and colleges. This
- resource provides practical guidance for schools and colleges on how to prevent, identify
- early and respond appropriately to child-on-child abuse.
- Sharing nudes and semi-nudes
- London Grid for Learning-collection of advice - Various information and resources dealing
- with the sharing of nudes and semi-nudes.
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with
- children and young people - Advice for schools and colleges on responding to incidents
- of non-consensual sharing of nudes and semi-nudes. Support for parents/carers
- National Crime Agency's CEOP Education Programme provides information for parents and
- carers to help protect their child from online child sexual abuse, including
- #AskTheAwkward, guidance on how to talk to their children about online relationships

# Appendix F

# Protocol for External Speakers or Organisations

In this protocol, our "CMAT" refers to St Gabriel the Archangel CMAT central team and all our academy.

Our CMAT potentially organises opportunities for children, pupils, students, and staff to hear from external speakers. In some cases, it is possible that our CMAT could also let our premises to external organisations for community events. In both these cases, the organiser at Trust level (reporting to the CEO) and Headteacher at school level (reporting to the DPS team) have a responsibility to ensure that the organisation is suitable.

As a Trust we will consider the following points before agreeing for an external organisation to use our premises
or hold an event for our central team or for our academy:

- The topic and purpose of the event
- Whether it would appropriate for students (and the likelihood of students attending the event if held
- outside normal school hours)
- The reputation of the organisers and any speakers – we will check the organisers and any speakers' status and history by searching the internet, including social media.
- Who might attend?
- Any risks to our schools and CMAT reputation and ethos
- The potential or likelihood that the visit will stir up hatred or incite violence.
- The views of the community safety team, local police or local Prevent coordinator if you have any concerns.

Through hosting external speakers, our CMAT will provide a safe space for students to engage with a variety of issues and hear and debate different perspectives. Our CMAT has a responsibility to ensure that the people they invite to speak are suitable and that all safeguarding procedures are followed.

When inviting speakers, the central team and schools are reminded of the following:

- Keeping children safe in education is statutory guidance that our CMAT must have regard to when carrying out our duties to safeguard and promote the welfare of children. When inviting speakers, our CMAT will be conscious of the safeguarding requirements in the guidance.
- The statutory guidance on the Prevent Duty makes clear that as part of our safeguarding policies, our CMAT should 'set out clear protocols for ensuring that any visiting speakers whether invited by staff or pupils themselves are suitable and appropriately supervised'.
- Our CMAT is subject to requirements to forbid political indoctrination and secure a balanced treatment of political issues. This extends to extra-curricular activities which are provided or organised for registered pupils at the school by or on behalf of the school.
- Teaching misconduct guidance 15 states that staff are 'likely to face prohibition if they deliberately allow exposure of pupils to such actions that undermine fundamental British values including promoting political or religious extremism by inviting individuals to speak in schools'.

Our schools play an important role within the community and will often let their premises to external organisations. This can also be a means of generating additional income for the benefit of the school. The above principles apply in relation both to speakers visiting during normal school hours and to organisations and individuals using the premises outside school hours.



With St Gabriel we promise to **walk with, not past**. We will help, we will listen, we will bring hope and speak for the vulnerable

# Appendix G Safeguarding Email Template for all Staff

**St Gabriel The Archangel Catholic Multi Academy Trust Safeguarding Email Template**

This email should be sent to all staff following delivery of the safeguarding CPD:

*Dear all,*

*To maintain our positive culture of Safeguarding, regular CPD forms part of our commitment to support staff in remaining knowledgeable, aware and skilled in their ability to safeguard.*

*Therefore, several attachments are included with this email which follow from the safeguarding CPD and information, and also provide a central resource and information source for you to refer to as and when needed throughout the year.*

*There are several key documents attached:*

- *Safeguarding Policy*
- *Staff Code of Conduct*
- *CPOMS User Guide*

***KCSIE September 2026***

*The hyperlink to KCSIE September is included here: Keeping Children Safe In Education 2026*
Keeping Children Safe In Education 2026: part one

***A hyperlink to SGtA Safeguarding Compliance and Best Practice Microsoft Form is included below. This is to be completed by all staff by the end of tomorrow***

*All staff need to complete the Microsoft Form in order that we have a record to confirm receipt of the documents and the identification of key information points by all staff. Please complete the Microsoft Form by the end of tomorrow.*

***Whistleblowing/Safer Recruitment Leaflet***

*The attached Whistleblowing leaflet contains important information that all schools have to share with staff as part of the whistleblowing procedures. In line with the Staff Code of Conduct, please be reminded that staff have a responsibility to report concerns regarding adults working with children to the Headteacher (INSERT NAME) directly. Concerns relating to other adults should not be reported to any other member of staff.*

***CPOMS User Guide***

*Please be reminded that all safeguarding concerns should be reported in person as soon as possible and then recorded on CPOMS. CPOMS is not a reporting system and should not replace the reporting of issues or concerns. All CPOMS entries should remain factual, concise but*

*inclusive of all necessary detail, should contain no abbreviations, and should not include opinions.*

*In line with the Staff Code of Conduct, GDPR requirements, and KCSIE, please also be reminded of the need to ensure that you do not share/connect your computer onto the classroom board or with students until you are satisfied that there is no confidential information visible. Any sensitive and confidential information should always be kept away from the visibility of students. Any entries within CPOMS should be added outside of the time when you are teaching.*

*The reporting system for urgent safeguarding issues if they arise when you are teaching is to inform a DSL immediately. If cover for a class teacher is required, use the emergency card system to request assistance via the school office.*

# Appendix H Safeguarding Reporting and Accountability Structure 2026-27

| St Gabriel the Archangel Catholic Multi Academy Trust<br>Safeguarding Strategy Schedule<br>*"For with God, nothing will be impossible."* | | | |
|---|---|---|---|
| | **Action(s)** | **Action owner** | **Date** |
| **Autumn term**<br>**First Half**<br>• Update and share the new academic year Keeping Children Safe in Education document (KCSIE) policy (website, staff, governors, parents). All staff must read Part One in full and must sign to acknowledge receipt<br>• Ensure staff read and acknowledge policies (safeguarding, Staff Code of Conduct, Safer Working Practice leaflet) via the Microsoft form<br>• Transfer safeguarding information for new and leaving students.<br>• Conduct KCSIE training for staff and log Continuous Professional Development (CPD) updates via SCR<br>• Identify and support students with safeguarding needs (e.g. child protection; child in need; child in care etc.) including assessing school facilities and updating procedures to support gender-questioning pupils<br>• Ensure Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs) are clearly identified and trained.<br>• Codify and approve job descriptions for safeguarding roles as relevant<br>• Review key policies (any that are impacted by KCSIE update e.g. behaviour, online safety etc.) for relevance and compliance. This | | | |

| | Action(s) | Action owner | Date |
|---|---|---|---|
| includes updating the Behaviour POlicy to reflect the Restrictive Intervention Guidance (April 2026) and the statutory mobile-phone-free environment<br>• Ensure that SGtACMAT Safeguarding Policy is contextualised to reflect individual academy profile, systems and needs<br>• Share SGtACMAT and academy Safeguarding Policies with staff<br>• Confirm governor oversight for safeguarding and related areas.<br>• Ensure safeguarding training is up-to-date for all staff, including all new staff.<br>• Audit medical and/or safeguarding display board, care plans, and training logs (those resources containing school community medical needs and procedures)<br>• Refresh safeguarding materials in school (posters, policies, helplines).<br>• Plan student safeguarding assemblies and awareness initiatives.<br>• Conduct a school safeguarding walk (with, for example, headteacher, DSL, safeguarding governor) to assess visibility of support resources and to ensure site and staff compliance<br>• Check/update Single Central Record (SCR), personnel files, and volunteer compliance.<br>• Visit all alternative provision settings and complete quality assurance visits and compliance records. Fortnightly visits should | | | |

| | Action(s) | Action owner | Date |
|---|---|---|---|
| be completed to all settings where pupils are attending: visits should be recorded within CPOMS and should include the voice of the child<br>• Monitor attendance, training, and staff/student safeguarding concerns.<br>• Schedule safeguarding governor meetings and local authority audits.<br>• Publish safeguarding updates for parents.<br>• Prepare for Anti-Bullying Week and relevant awareness campaigns.<br>• Visit all pupils attending alternative provision fortnightly and maintain daily contact with parents. This must include recording the pupil's voice/views<br>• Share regular CPD updates via identified internal communication channels relating to contextual safeguarding issues<br>• Review patterns and trends in safeguarding data, including filtering and monitoring data, and ensure that support/intervention meets needs effectively, including through upcoming academy CPD schedule<br>• Review PREVENT risk assessment and ensure that it remains comprehensive and accurate<br>• Share PREVENT risk assessment with staff, governors and leadership<br>• Deliver updated Prevent training focusing on non-violent extremism and online radicalisation pathways (e.g gaming platforms) | | | |

| | Action(s) | Action owner | Date |
|---|---|---|---|
| • Complete Home Office/DfE PREVENT training (all staff) via National College<br>• Conduct and document the statutory annual filtering and monitoring review, led by SLT F&M Lead and DSL, testing physical devices in all areas | | | |
| **Autumn term**<br>**Second half**<br>• Organise and promote Anti-Bullying Week.<br>• Reinforce safeguarding protocols with staff.<br>• Conduct regular safeguarding briefings and updates.<br>• Review attendance data workflows using a systematic improvement tool to target barriers and persistent absence.<br>• Review safeguarding software solutions data and address emerging risks.<br>• Assess safeguarding practices for SEND students, including Restrictive Intervention logs, de-escalation plans and risk assessments.<br>• Update staff well-being and low-level concern protocols.<br>• Ensure compliance checks for SCR, personnel files, and volunteer protocols.<br>Review patterns and trends in safeguarding data, including filtering and monitoring data, and ensure that support/intervention meets needs effectively, including through upcoming academy CPD schedule | | | |

| St Gabriel the Archangel Catholic Multi Academy Trust<br>Safeguarding Strategy Schedule<br>*"For with God, nothing will be impossible."* | | | |
|---|---|---|---|
| | **Action(s)** | **Action owner** | **Date** |
| • Complete and submit BDES Safeguarding Monitoring Audit (if requested) | | | |
| **Spring term**<br>**First Half**<br>• Conduct a self-assessment and external safeguarding review.<br>• Deliver staff training on online safety and key safeguarding updates, including and especially AI generated imagery and CSAM (deepfakes).<br>• Review safeguarding curriculum effectiveness.<br>• Assess PSHE/RSE and safeguarding curricula to explicitly teach children about the risks of online misogyny, deepfakes, and AI-simulated relationships (COntact/COnduct risks).<br>• Audit SCR, personnel files, and volunteer processes.<br>• Ensure safeguarding information is transferred for new/leaving students.<br>• Publish updates on Safer Internet Day and Children's Mental Health Week.<br>• Complete and submit BDES Safeguarding Monitoring Audit (if requested)<br>• | | | |
| **Spring term**<br>**Second Half**<br>• Continue safeguarding briefings and risk assessments.<br>• Review safeguarding impact through student/staff/parent feedback.<br>• Analyse trends from safeguarding software solutions reports. | | | |

| St Gabriel the Archangel Catholic Multi Academy Trust<br>Safeguarding Strategy Schedule<br>*"For with God, nothing will be impossible."* | | | |
|---|---|---|---|
| | **Action(s)** | **Action owner** | **Date** |
| • Ensure up-to-date risk assessments and training compliance. | | | |
| **Summer term**<br>**First Half**<br>• Conduct safeguarding briefings and staff reviews.<br>• Monitor attendance and safeguarding for vulnerable students.<br>• Audit safeguarding signage and student awareness materials.<br>• Analyse safeguarding curriculum impact and plan next year's strategy.<br>• Conduct SCR and personnel file checks.<br>• Complete and submit BDES Safeguarding Monitoring Audit (if requested) | | | |
| **Summer term**<br>**Second Half**<br>• Conduct final safeguarding assessments and safeguarding software solutions analysis.<br>• Update Prevent risk assessment and prepare for the new academic year.<br>• Ensure new staff safeguarding training is planned for September.<br>• Review updated guidance and research documents to ensure that newly -emerging priorities are identified and so that safeguarding strategy can be reviewed and updated to meet need | | | |

| | Action(s) | Action owner | Date |
|---|---|---|---|
| • Audit safeguarding policies for the next academic year.<br>• Review transition plans for incoming and outgoing students.<br>• Prepare compliance documentation for contractors and staff - including updating annual LOA<br>• Review Single Central Record (SCR) and recruitment files to ensure all volunteers have an enhanced DBS with Barred List Check.<br>• Ensure awareness campaigns for National School Sports Week. | | | |
| **Ongoing Actions Throughout the Year**<br>• Weekly safeguarding briefings for staff.<br>• Regular audits of safeguarding resources, training logs, and compliance SCR<br>• Review safeguarding data, referrals, and sanctions to identify disproportionality. Actively training staff to identify, record and and challenge racism and discriminatory behaviours.<br>• Continuous monitoring of attendance, safeguarding software solutions reports, and student safety.<br>• Ensure attendance monitoring actively reviews mental health, anxiety and suicidal ideation as primary barriers to attendance, integrating support through the local Family Help framework. | | | |

| St Gabriel the Archangel Catholic Multi Academy Trust<br>Safeguarding Strategy Schedule<br>*"For with God, nothing will be impossible."* | | | |
|---|---|---|---|
| | **Action(s)** | **Action owner** | **Date** |
| • Regular communication with parents and staff on safeguarding updates through e.g. newsletters<br>• Governor oversight meetings and compliance checks.<br>• Ensuring safeguarding policies are visible, accessible, and up to date.<br>• Ensure that local authority S175 audit is completed, submitted to the LA, and shared with leadership team, governing body and staff as relevant<br>• Review S175 through the year against action plan<br>• Review the RSHE curriculum against statutory guidance, CST, Bishops' Directives, and safeguarding context<br>• Review contextual safeguarding needs and respond through staff actions, RSE/PSHE curriculum as necessary<br>• Ensure that any instances of Restrictive Intervention (physical restraint or seclusion) is recorded immediately on CPOMS, and that parents are notified and provided with a copy of the written record on the same day.<br>• reeview | | | |