



LEAGRAVE PRIMARY SCHOOL

‘Striving for Excellence, Learning for Life’

SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICY

(including safer recruitment, allegations against staff and low-level concerns)

Ratified by Governors

Date September 2025

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This Policy must be reviewed annually.

STATUTORY

We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Debbie Bastin (Deputy Headteacher)	01582 571951
Deputy DSL (DDSL)	Edel Gillespie(Headteacher) Debbie Egbaran (Senior Assistant Head) Lisa Scott (Senior Assistant Head) Sadia Tufiq (Assistant Head and SENDCo)	01582 571951 01582 571951
Local authority designated officer (LADO)	Paul James	01582 548069
Chair of governors	Julius Kandekore	01582 571951
Multi-Agency safeguarding Hub (MASH)	Children's Social Services	01582 547653
Channel helpline		20 40 7264

1. Introduction

Leagrave Primary School is committed to safeguarding and promoting the welfare of all its children.

We believe that:

- All children/young people have an equal right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.
- All children have the right to speak freely and voice their values and beliefs.
- Where there is a safeguarding concern the child's wishes and feelings, as far as possible, should be taken into account when determining what action to take and what services to provide
- All children must be encouraged to respect each other's values and support each other.
- All children have the right to be supported to meet their emotional, and social needs as well as their educational needs.
- Schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours which may be perceived to be too 'risky'.
- All governors, staff, parents and carers, volunteers and visitors and pupils have an important role to play in safeguarding children and protecting them from abuse.
- Working in partnership with families, individuals, parents and carers and other agencies is vital in order to meet children's identified needs and to ensure that equal access is given to all those in need.

The school has a zero tolerance approach to sexual violence and sexual harassment.

The school ensures that child protection policies include procedures for dealing with child on child abuse.

2. Aims

The school aims to ensure that:

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

This policy will contribute to the safeguarding of children and promote their welfare by:

- Clarifying standards of behaviour for staff and children,
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values,
- Creating an organisational culture that is safe for children,
- Introducing appropriate work within the curriculum,
- Encouraging children and parents to participate,
- Developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns,
- Addressing concerns at the earliest possible stage in the least intrusive way,
- Capturing the child's voice where possible

3. Legislation and statutory guidance

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

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- › [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

4. Definitions

Safeguarding and promoting the welfare of children is defined as:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

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

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

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

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

5. Equality statement

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

We give special consideration to children who:

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

- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after (see section 13)
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

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

- › Behaviour policy
- › Pastoral care
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

6. Roles and responsibilities within a safe culture

6.1 Safeguarding and child protection is everyone's responsibility.

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

The culture of this school is one that is safe for children and unsafe for adults who may pose a risk to children. Safeguarding is the responsibility of all adults working or volunteering here and all concerns are reported to the designated safeguarding lead or Headteacher when concerns relate to an adult.

The school has a culture of listening to, and hearing the voice of the child. The school ensures victims are taken seriously and allegations are responded to appropriately

Linked to our Staff Code of Conduct and Whistle-blowing policies, our safe working practices ensure that the pupils are safe and that all staff:

- › Work in an open and transparent way
- › Discuss and/or take advice from school management over any incident which may give rise to concern
- › Record any incidents on the safeguarding recording forms (Appendix 10) and give them to the designated safeguarding lead (DSL)
- › Apply the same professional standards regardless of gender, sexuality, race, ethnicity or disability
- › Comply with and are aware of the need for confidentiality
- › Understand they must not ever put children at risk of harm

- › Understand that the identification tags that they wear must be worn at all times when on school premises and that they are for their personal use only and must never, under any circumstance, be given to a child
- › Are aware of visitors: all visitors must be signed into school at the main reception where they will be given an identity badge to wear on a lanyard or a sticker. Unidentified visitors or anyone not wearing such a lanyard or sticker must be challenged by staff and reported to the Headteacher or a member of the senior leadership team immediately
- › Know that no classroom doors should be locked whilst pupils are in the rooms and barriers should not be put over glass in doors which could obscure vision into classrooms
- › Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them

Every child who attends this school will have a home visit before starting. No child will be allowed to start until this visit is completed by a member of staff from the school.

Safe touching

This school does not operate a 'no touch' policy as we believe this could be detrimental to the wellbeing of pupils. However, we do have an expectation of 'safe touching'. This would include situations where a child may need help up if they fall over, touching a child with permission from the child when administering first aid, or appropriate touching in order to comfort a child. When a child needs comforting, it should be age appropriate and it will only take place where there is more than one member of staff in the room.

Hugs from an adult will only be given if a child initiates the hug. The hug will only be recognised as safe if the pupil instigates it. The hug must not last longer than necessary and should be appropriate and in view of others. Side hugs should be used where possible.

When a pupil is in need of intimate care, the Intimate Care policy must be followed and parents must have signed an intimate care plan in order for intimate care to be given. Wherever possible there should be two members of staff present for intimate care to take place.

The school has a Positive Handling policy and on rare occasions physical interventions may need to be used as a behaviour strategy. The policy is very clear that this should only ever be used as a last resort when all other appropriate strategies have been exhausted. Physical contact in these situations must be kept to a minimum and physical contact must never be used as a punishment. (Please cross reference the Positive Handling policy for further details)

6.2 All staff

All staff will:

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

All staff will be aware of:

- › Our systems which support safeguarding, including this Safeguarding Children and Child Protection policy, the staff Code of Conduct, the role and identity of the DSL and the deputy designated safeguarding leads (DDSLs), the Behaviour policy, the Mobile Devices Acceptable Use policy, the Internet Safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education

- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- › What to look for to identify children who need help or protection

6.3 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Mrs Debbie Bastin (Deputy Headteacher). She takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. She takes lead responsibility for promoting the educational outcomes of our most vulnerable pupils 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 in school.

She provides support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the Family Partnership Service, Children's Social Care, Health, Police etc.

The DSL is supported by the following Deputy Designated Safeguarding Leads (DDSL's):

Edel Gillespie (Headteacher)

Debbie Egbaran (Senior Assistant Head)

Lisa Scott (Senior Assistant Head)

Sadia Tufiq (Assistant Head and SENDCo)

The DDSL's are trained to the same level as the DSL and will undertake this role operationally with direct oversight and management from the DSL who maintains lead responsibility for safeguarding and child protection.

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

The DSL can also be contacted out of school hours if necessary, by email (dbastin@leagraveprimary.co.uk) and members of staff and other professionals may contact her via her school mobile phone. Parents and carers may contact her via email or the school phone (01582 571951).

When the DSL is absent, the DDSL's – Mrs Gillespie, Mrs Egbaran, Miss Scott or Mrs Tufiq will act as cover and can be contacted via the school email (Admin@leagraveprimary.co.uk) or the school phone (01582 571951)

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

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- › Contribute to the assessment of children

- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Have a good understanding of harmful sexual behaviour
- › Have a good understanding of the filtering and monitoring systems and processes in place at our school
- › Complete the annual audit return, as per the statutory duty to safeguard children across the local authority in order for compliance to be measured by the local authority.

The DSL will also:

- › Liaise with other agencies, including the safeguarding partners, about the child protection and safeguarding of children
- › Use Luton's Effective Support Threshold Document to inform decisions that are made with regard to child protection and the safeguarding of children
- › Keep the headteacher informed of any issues
- › Liaise with local authority case managers and designated officers about child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. (For further information about this see the statutory guidance PACE Code C2019)

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

6.4 The governing body

The governing body will:

- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- › Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- › Ensure that:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - All staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). (Please cross reference the Low-level Concerns policy)
- This policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- › Where another body is providing services or activities the governing body will:
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 11).

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

All governors receive safeguarding training at induction.

Section 16.3 of this policy has information on how governors are supported to fulfil their role.

6.5 The Headteacher

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

- › Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- › Ensuring that when a child joins the school, parents and carers are informed of this policy and that it can be accessed via the school website or, if requested, a hard copy can be made available to them
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 11)
- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL, or another senior member of staff, on this
- › Ensuring the relevant staffing ratios are met, where applicable
- › Making sure each child in the Early Years Foundation Stage is assigned a key person
- › Overseeing the safe use of technology, mobile phones and cameras in the setting

7. Confidentiality

Please cross reference with our Data Protection Policy.

We take confidentiality very seriously and understand that all matters relating to Child Protection are confidential, ensuring that such matters are only disclosed to staff members and other professionals on a

'need-to-know' basis. However, we co-operate fully with the three safeguarding partners and share information with them as required when working with or when there are concerns about a child. We will attend all multi-agency meetings about children who attend this school and for whom there are concerns raised by us, or one of the partner agencies, and we will write reports based on our knowledge of the child when required to do so, such as for child protection conferences.

We co-operate fully with the three safeguarding partners and share information with them as required when they are working with a child or when there are concerns about a child. We attend all multi-agency meetings about children who attend this school and about whom there are concerns. We write reports based on our knowledge of the child when required to do so, such as for child protection conferences.

Information about a child will always be shared with professionals in order to promote the welfare, and protect the safety, of children. Timely information sharing is essential to effective safeguarding. This includes sharing any concerns about a child as soon as possible with the DSL who in turn will share the concerns with MASH or parents/carers in a timely fashion. Safeguarding files will be shared with children's new schools within five days of them starting.

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:

- › it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- › Staff never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- › If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL will consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to MASH
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

(If the allegation is against another child, please cross reference our Child on Child Abuse policy.)

Regarding anonymity, all staff will:

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

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

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

Confidentiality is also addressed in this policy with respect to record-keeping in section 15 of this policy.

8. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

A referral is made to children’s social care and/or the police **immediately** if it is believed that a child is suffering or likely to suffer from harm, or is in immediate danger. The referral is usually made by the DSL but **anyone can make a referral**.

The number to call in the first instance is **01582 547653** which is the number for MASH. They will advise of the next steps to take.

The DSL must be informed as soon as possible if the referral is not made by her.

The following link may also be used to report child abuse to the local council:

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

8.2 When a child makes a disclosure

If a child discloses a safeguarding issue to an adult, they must:

- › Listen to and believe them. Allow them time to talk freely and not ask leading questions
- › Stay calm and not show that they are shocked or upset
- › Tell the child they have done the right thing in telling them.
- › Explain what will happen next and that the information will have to be passed on. (They must not promise to keep it a secret)
- › Write up the conversation as soon as possible in the child’s own words on a Child Protection form. Stick to the facts, and must not put their own judgement on it
- › Sign and date the write-up and pass it on to the DSL. They must not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

It is important to remember that some children may:

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

None of this should prevent anyone from having a ‘professional curiosity’ and speaking to the DSL when they have concerns about a child.

8.3 If it is discovered that Female Genital Mutilation (FGM) has taken place or a pupil is at risk of FGM

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 3 of this policy.

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures which are to complete a child protection form and hand to the DSL as soon as it is practicable to do so.

8.4 When there are concerns about a child (as opposed to a child believed to be suffering or likely to suffer from harm, or being in immediate danger)

Figure 1 below, in section 8.6, illustrates the procedure to follow if there are any concerns about a child's welfare.

All staff, volunteers and visitors have a responsibility to take prompt action if they are concerned about the welfare or safety of a child. This must be reported to the DSL immediately.

All staff, but especially the DSL will consider whether children are at risk of exploitation or abuse within or 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.

Where possible, the DSL should be spoken to first to agree a course of action.

If in, exceptional circumstances the DSL and the DDSL's are not available, the person with the concern should speak to a member of the senior leadership team and/or take advice from MASH. They can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Details of any actions that are taken must be recorded and shared with the DSL as soon as practicably possible

What we do when we are concerned about a child.

- › All concerns are viewed alongside Luton's Effective Support Thresholds Framework in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.
- › The school also places due regard to the guidance contained in 'What to do if you are worried a child is being abused.' (2015)
- › If, in consultation with the Effective Support document, the level of concern sits at Level 2 support will be provided by the school as the leading professional body. The Luton directory may be used to identify appropriate agencies and wider support for families. If, in consultation with the Effective Support document, the concern sits at a Level 3, a referral will be made to the Family Partnership Service via MASH. Additional support or advice for this work may be sought from the Family Partnership Service as a multi-agency response.
- › In cases where it is not possible to obtain consent from the parent / carer the school seeks advice from MASH.
- › The school reviews each case to ensure that any support or intervention provided has impacted positively on the welfare/safety of the child and that improvement is sustained.
- › In the event that provision of Family Partnership has not led to improvements for the child, or concerns escalate, the school will follow the step-up escalation procedures published by the local Multi Agency Safeguarding Arrangements (LSCB)
- › If the concerns about the child indicate that they may be at risk of or suffering significant harm, a referral is made to the Multi Agency Safeguarding Hub.

- › The parent/carers are informed of the referral unless informing the parent may place the child at increased risk of harm.
- › In the event of a professional disagreement in relation to a specific concern, the school will follow the LSCB procedures for resolution of professional disagreements, also known as escalation procedures.

It is **not** the responsibility of the school staff to investigate welfare concerns or to determine the truth of any disclosure or allegation. All members of staff, however, have a duty to recognise concerns. Accordingly, all concerns regarding the welfare of children are reported to the DSL and are recorded.

All visitors and volunteers will:

- › Read Appendix 6 of this policy which contains guidelines for visitors to the school.
- › All visiting professionals who work directly with children are asked to read Appendix 5 which has more detailed Safeguarding procedures for adults who may be un-supervised with pupils at Leagrave Primary School.
- › If a visitor or volunteer has concerns about a child, they follow the Child Protection procedures outlined above.

Early Help Assessment

Early Help Assessments (EHA's) are carried out with parents/carers who seek support or whose children have been identified as needing extra support due to concerns that have been raised about them but who are not believed to be suffering, or likely to suffer from harm or immediate danger. The DSL or Community Education Officer usually completes EHA's with families.

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

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

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

Referral

If a member of staff has a concern about a child, they refer the child to the DSL as soon as it is practicable to do so. This concern is also recorded on a safeguarding recording form. (See Appendix 10)

The DSL decides what steps should be taken in accordance with Luton's Effective Support Threshold Framework and initiates a response accordingly. This may include providing a single agency early help response, undertaking a Family Partnership referral or referral to Children's Social Care for a statutory social work assessment. The Headteacher will be kept apprised of all cases.

If it is appropriate to refer the case to MASH, the DSL will usually make the referral.

Having referred to the NSPCC document, "When to call the Police," the DSL or Headteacher will refer possible or suspected crimes to the police.

It is not expected that anyone other than the DSL will make referrals to MASH, but should another member of staff do so, they must tell the DSL as soon as possible what they have done and keep a record.

When making a referral, the following steps must be taken:

- › Telephone MASH (01582 547653). Ensure you know/ record the name of the practitioner with whom you speak
- › A MASH manager will either call back or email the person who phoned

- › They will ask for further information and will give advice on whether a referral should be made to them or not. Other advice may include speaking to parents, monitoring the child, speaking to siblings
- › If advised to make a referral, fill in the online form for Luton MASH
- › The DSL should be informed of each step and will support staff who make referrals

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

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

8.5 If there is a concern about extremism

If there is a concern about extremism and the DSL should be spoken to first to agree a course of action.

If in **exceptional circumstances** the DSL is not available, this should not delay appropriate action being taken. A member of the senior leadership team should be consulted and/or advice sought from MASH. A referral must be made to MASH directly, if appropriate (see 'Referral' above). The DSL should be informed as soon as possible.

Where there is a concern, the DSL will consider the level of risk. Referrals will be made to MASH and possibly the police and they may lead to a referral to [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

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

8.6 If there is a concern about mental health

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

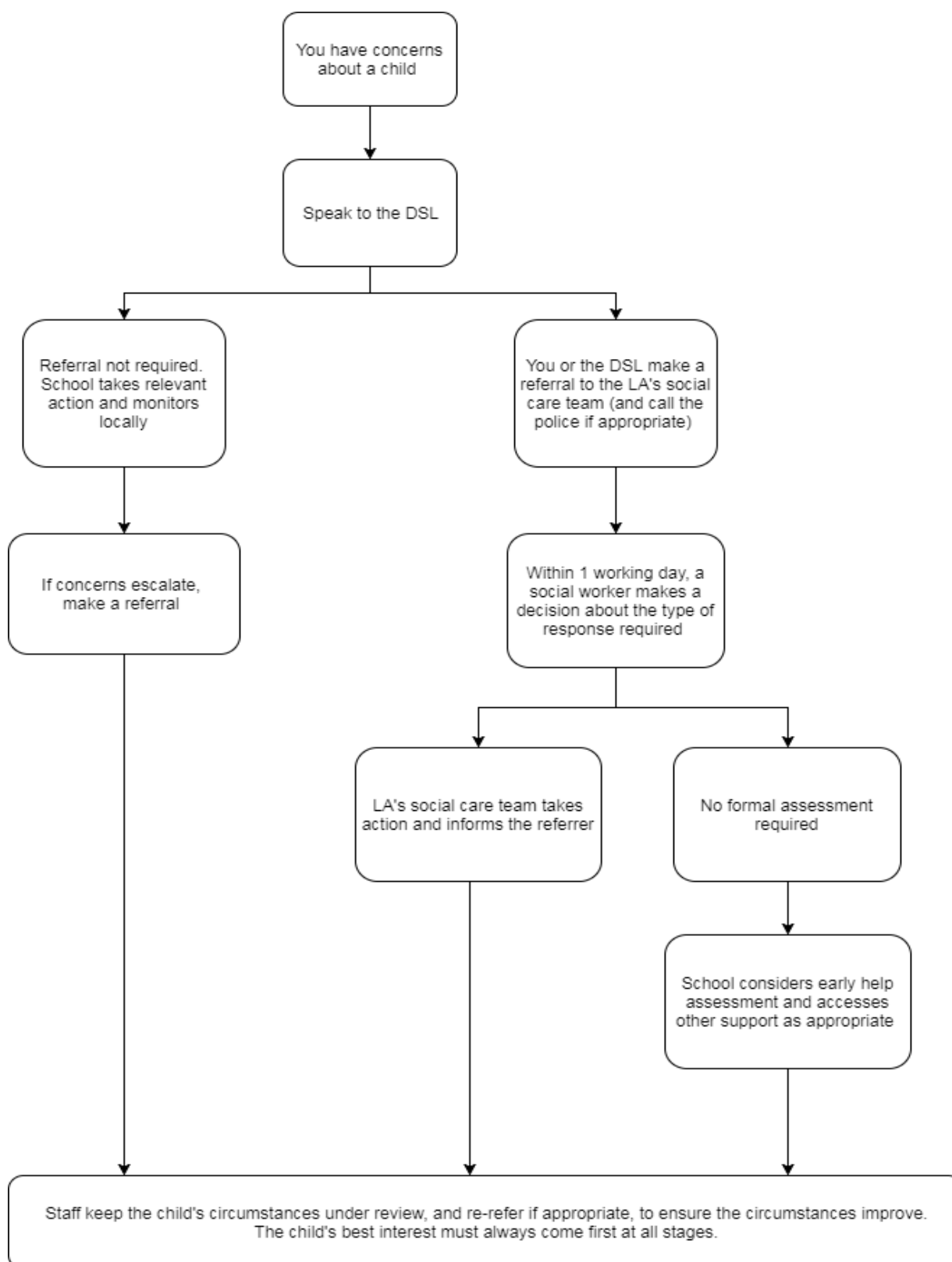
Staff are alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If there is a concern about a child's mental health that is also a safeguarding concern, the immediate action in section 8.4 of this policy must be taken.

If there is a mental health concern that is **not** also a safeguarding concern, the DSL or SENDCo must be spoken to in order to agree a course of action. (please see the SEMH policy)

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

(Note – if the DSL is unavailable, this should not delay action. See section 8.4 for what to do.)



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

The school complies with the LSCB procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances

This procedure is used in any case in which it is alleged that a member of staff (including supply staff), governor, visiting professional or volunteer has:

- › Behaved in a way that has harmed a child or may have harmed a child,
- › Possibly committed a criminal offence against or related to a child, or
- › Behaved in a way that indicates s/he may pose a risk of harm to children.
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children.

In accordance with the Early Years Foundations Stage, we inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification is made as soon as reasonably possible and always within 14 days of the allegations being made.

We consult with the LADO when an allegation is made against a member of staff to agree how to progress this.

All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

Allegations or concerns about colleagues and visitors must be reported directly to the Headteacher unless the concern relates to Headteacher. If the concern relates to the Headteacher, it must be reported immediately to the Chair of Governors. Such concerns must be reported directly to the Local Authority Designated Officer (LADO) in children's social care, who will liaise with the Chair of Governors and decide on any action required.

If the Headteacher is not available, the member of staff should report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns. Contact into the LADO should happen at the earliest possible opportunity and within one working day.

The LADO can be contacted on 01582 548069

The LADO may request a referral, if this is requested the referral will be completed and submitted within one working day.

The school will engage with the LADO at all stages of the management of the allegation / concern and comply with the Statutory Guidance contained within Keeping Children Safe in Education (2024) and the local procedures published by the LSCB.

In this regard, the school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered. Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.

Should the school dismiss a member of staff/volunteer as a result of a substantiated allegation, or should a member of staff/volunteer resign before an investigation has been completed, in accordance with Statutory Duty, a referral to the Disclosure and Barring Service will be made. If the member of staff is engaged in teaching work, the school will, in accordance with published guidance from the Department for Education, consider whether a referral to the Teaching Regulation Agency (TRA) should be made.

The school adheres to the statutory guidance contained within Keeping Children Safe in Education (2024) with regard to record keeping, confidentiality, references and compromise or settlement agreements.

If an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per the school's Behaviour Policy/ Code of Conduct.

We have appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children.

If a member of staff, student or volunteer has any concerns about poor, unsafe practice or failures of the safeguarding regime they are encouraged to raise this with the Headteacher, senior leadership team or governing body following the whistle-blowing procedures of the school.

The NSPCC whistle-blowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the school. 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.

The school recognises that there may be occasions when an adult working at the school's behaviour causes low-level concerns. This means that the behaviour does not cause risk to children and does not reach the criteria for behaviours of harm or potential harm that will be referred to the LADO. These behaviours are not insignificant and are taken seriously. The school has a Low-level Concerns policy and has procedures in place to deal with low-level concerns. (Please cross reference the Low-level Concerns policy)

If an allegation, relating to an incident where an individual or organisation using the school premises for running an activity for children, is received, our school safeguarding policies and procedures are followed and the LADO is informed.

Where appropriate and in accordance with the Early Years Framework, the school informs Ofsted of any allegations and actions taken, within the necessary timescale. (see Appendix 11 for more detail).

8.8 Allegations of abuse made against other pupils

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

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

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

- › Is serious, and potentially a criminal offence
- › Could put pupils in the school at risk
- › Is violent
- › Involves pupils being forced to use drugs or alcohol
- › Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix 3 for more information about child-on-child abuse

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

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

- › The allegation is recorded and reported to the DSL, but must not be investigated by staff
- › The DSL contacts MASH and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL puts a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a

named person they can talk to if needed. This includes considering getting to and from school as times and places where both the victim and/or alleged perpetrator(s) may be vulnerable.

- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- › If the incident is a criminal offence and there are delays in the criminal process, the DSL works closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We ask the police if we have any questions about the investigation.

(Please cross reference our Child-on-Child Abuse policy)

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

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

To achieve this, we:

- › Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- › Are vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 8.10 below)
- › Ensure staff reassure victims that they are being taken seriously
- › Are alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- › Ensure staff are trained to:
 - recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

and they understand that:

- even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- they have an important role to play in preventing child-on-child abuse and they must respond where they believe a child may be at risk from it
- they should speak to the DSL if they have any concerns

- social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

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

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

We follow an approach suggested by and based on [guidance from the UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders.

Our responsibilities when responding to an incident

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately.

Members of staff must **not**:

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

The members of staff must explain that they will have to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL holds an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the DDSL's, including the Headteacher. This meeting considers the initial evidence and aims to determine:

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

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

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this is done through dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, are recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education and internet safety lessons.

8.10 Reporting systems for our pupils

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

To achieve this, we:

- › Have systems in place for pupils to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Each class is encouraged to talk to their class teachers in the first instance as this is the member of staff they generally know best.

Children are also encouraged to talk to the Community Education Officer who is a familiar adult to them all. She works across the school in different classes and also stands on the gate welcoming them to school each day and dismissing them at the end of each day. She supports children in the dining hall at lunch time. This ensures that she is visible, familiar and accessible to them.

Posters are displayed around the school encouraging children to talk to an adult and giving suggestions about who they may choose to talk to if they are concerned, upset or being hurt by someone else.

All classes have 'Worry boxes' where children are able to share any concerns they have in a non-threatening way. Teachers monitor these daily.

Children are taught about the role of the DSL and how to access her through RSE and PSHE lessons and assemblies. Reassurances are given to all children that if they have something they need to talk about, an adult will listen to them and action will be taken.

Children attend the "Speak out. Stay safe" assembly annually which encourages them to think about who they can speak to if they are being hurt or have concerns.

The school has a Child Friendly Safeguarding policy which every child receives, explaining in child appropriate vocabulary how they have the right to be safe, should not be hurt by anyone and what to do if they need help. This is also displayed on the website.

9. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material. We are committed to creating a safe digital environment and ensuring that children are supported to navigate the online world safely and responsibly.

We acknowledge the growing risks posed by **misinformation, disinformation, and conspiracy theories**, which can negatively influence children's understanding, wellbeing, and decision-making. We are committed to promoting digital literacy and critical thinking to help children identify and challenge misleading or harmful content.

We understand that technology is a significant factor in many safeguarding and wellbeing concerns, including but not limited to:

- Exposure to harmful or inappropriate online content
- Online bullying, harassment, or exploitation
- The impact of screen time and digital overuse on mental and physical health
- Grooming and radicalisation through online platforms

To address these risks, we will:

1. **Educate** children, staff, and parents/carers about safe and responsible use of technology.
2. **Implement appropriate filters and monitoring systems** to protect children from harmful online material.
3. **Provide clear reporting and response procedures** for online safety incidents or concerns.
4. **Work in partnership** with parents, carers, and relevant external agencies to safeguard children effectively.
5. **Establish clear mechanisms** to identify, intervene in and escalate any incidents or concerns, where appropriate.
6. **Review and update policies regularly** to reflect emerging online risks and technologies.
7. **Develop guidance** for staff and children on the use of generative AI tools.

Through these measures, we aim to ensure that technology is used positively and safely, supporting children's learning and development while protecting their wellbeing.

The 4 key categories of risk

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

- › **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- › **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- › **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- › **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- › Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members receive refresher training as required and at least once each academic year
- › Educate parents/carers about online safety via our website, communications sent directly to them and through parents' meetings. We also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile devices, for example:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit use of them to non-contact time at break and lunch times in the staff room. They must be used respectfully at such times.
 - All personal mobile devices must be stored in a bag in a secure place in the classroom that children are prohibited from accessing.
 - Mobile devices must be on silent and may not be used in any way during lesson time.
 - If a private call needs to be made, then staff may request for a room may be made to the senior leadership team or the school office.
 - Staff are not permitted take photographs or recordings of pupils on their personal phones or cameras or other devices
 - Mobile devices must be transported through school, unseen in a zipped bag.
 - Mobile devices must be kept out of sight at all times.
 - Under no circumstances should staff give their phone number to children or parents of the school.
 - Memory sticks and hard drives are for school use only. They must not have personal/family information on them and must not be used in public spaces.
 - Staff are responsible for the devices they use that contain information about children at Legrave Primary School. They should not contain children's whole names. If they go missing, the Headteacher must be informed immediately.
- › Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

- › Carry out an annual review of our approach to online safety, including the use of the DfE technology planning tool to evaluate out filtering and monitoring systems and to identify areas for improvement.
- › Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- › Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

The above section summarises our approach to online safety and mobile device use. For full details about our school's policies in these areas, please refer to our Online Safety and Mobile Device Acceptable Use policies which can be found on our website.

As part of our commitment to safeguarding children under *Keeping Children Safe in Education (KCSIE) 2025*, we recognise that artificial intelligence (AI), including generative AI tools, presents both opportunities and risks. We therefore will ensure that any AI technologies used within our setting are subject to robust risk assessment, filtering and monitoring in line with the Department for Education's Generative AI: Product Safety Expectations. We will include awareness of AI-related harms (for example, misleading content, generated deepfakes, privacy risks, and misuse) in staff training, acceptable use policies, and online safety education for pupils. We also commit to maintaining human oversight over AI-driven processes to ensure decisions affecting children's wellbeing remain grounded in professional judgement and ethical standards.

10. Partnership with parents or carers

The school shares a purpose with parents/ carers to educate and keep children safe from harm. If there is a concern about a child, it is shared with the DSL on a safeguarding recording form (Appendix 10). The DSL will assess the concern and will contact Social Care if appropriate to do so. All child protection forms, records of conversations and meetings, actions and safeguarding files are kept in a locked filing cabinet in the DSL's office.

We are committed to working with parents positively, openly and honestly. We treat all parents with respect, dignity and courtesy. Where appropriate, we discuss any concerns about a child with the child's parents or carers. The DSL normally does this in the event of a suspicion or disclosure.

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

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

Leagrave Primary School will share any concerns that we have about a child with parents, unless to do so may place a child at risk of harm.

We respect parents' rights to confidentiality and we do not share sensitive information unless we have permission to do so, or it is necessary to do so in order to protect a child. Children may be discussed with professionals from statutory agencies who are working with them but children are never discussed with parents or carers other than their own and concerns about children are never raised with adults other than their parents. Children are not discussed with other professionals, such as solicitors and where requests to do so are made, the school will seek advice and guidance from the school's legal advisors.

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

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

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

We encourage parents to discuss any concerns they may have with the class teacher or the DSL.

Leagrave Primary School works in partnership with Luton Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their homes; nationally this scheme is called Operation Encompass. On receipt of any information, the Nominated Relay SPOC (Debbie Bastin) decides on the appropriate support the child requires: this could be silent or overt.

All information sharing and resulting actions from this is undertaken in accordance with the 'LC Protocol for Domestic Abuse – Notifications to Schools'. We record this information and store the information in accordance with the record keeping procedures outlined in this policy.

The school also receives notification from Operation Encompass if a child goes missing from home.

Leaflets are available at Reception that explain what parents or carers should do if they have a safeguarding concern about their child in school, or wish to make a complaint about or an allegation against a member of staff. (Appendix 9)

We make parents aware of our policy on the website and in the prospectus, and hard copies are available to any parents who request a copy. Posters, displays and leaflets about the school also ensure that safeguarding has a high profile within the whole school community and that staff, visitors, parents and children know who to approach with a concern.

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

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for some pupils. This may include:

- › 1:1 support
- › Wellbeing interventions and group times.
- › Zones of Regulation
- › Play therapy and other external professionals as appropriate.

The SENDCo and DSL liaise closely when abuse is known about or suspected involving pupils with SEND.

If a pupil is placed in an Alternative Provision (AP), Leagrave Primary School remains responsible for the pupil's safeguarding. Therefore, we will obtain written confirmation from the AP that they have conducted appropriate safeguarding checks on all individuals who work with the pupil. Written confirmation will also be required from the AP of any staff changes so that we can be sure that any new staff have also been checked, in accordance with KCSIE 2025.

12. Pupils with a social worker

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

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

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

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

13. Looked-after and previously looked-after children

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

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

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

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

As part of their role, the designated teacher will:

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

14. Complaints and concerns about school safeguarding policies

14.1 Complaints

(Please cross reference our Complaints policy)

14.2 Whistle-blowing

(Please cross reference our Whistle-blowing policy)

15. Record-keeping

We hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, are recorded in writing.

Records include:

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

Concerns and referrals are kept in a separate child protection file for each child. There is a file for every child about whom there has been a concern that has resulted in contact with Social Services or Family Support Partnership (even if the advice from these agencies has been No Further Action) or who have external agencies working with them and are already on, or have been subject to, an Early Help Plan, Child In Need Plan or a Child Protection Plan. These files are paper-based and each child's file is stored securely away

from academic records in a locked filing case in the DSL's office which is locked when she is not there. An individual record is kept for each child: we do not keep family files.

Access to safeguarding and child protection files is restricted with only the DSL or DDSL's having access to them.

Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

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

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

Additionally, if the concerns are significant or complex, and/or social services are involved, the DSL may speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. If a child moves from our school, the DSL ensures child protection records are forwarded on to the DSL at the new school with due regard to their confidential nature and in line with current government guidance on the transfer of such records.

Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. We record where and to whom the records have been passed and the date. We ensure secure transit and obtain a confirmation of receipt. The practice guidance produced by LSCB is adhered to in relation to archiving child protection records.

If sending by post, children's records are sent by "Special/Recorded Delivery". For audit purposes, a note of all children's records transferred or received is kept in either paper or electronic format. This includes the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

Proof of receipt is obtained from schools receiving Safeguarding files when a child transfers to a new school.

If a child is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records are forwarded to the relevant organisation.

If a child is being removed from school roll in order to be home educated, the school ensures all relevant safeguarding information is shared with the Elective Home Education team.

The Designated Safeguarding Lead keeps a record of all referrals that are made to Children's Social Services.

All individual safeguarding and child protection records are kept by the school until a young person reaches their 25th birthday or are forwarded to the child's next school when they leave this school.

When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder.

In exceptional circumstances when a face to face handover is unfeasible, the Headteacher will ensure that the new post holder is fully conversant with all procedures and case files.

16. Training

16.1 All staff

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

This training is regularly updated and will:

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

All staff have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Volunteers receive appropriate training, if applicable.

16.2 The DSL and DDSL's

The DSL and DDSL's undertake child protection and safeguarding training at least every 2 years.

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

They also undertake Prevent awareness training.

The DSL attends other safeguarding opportunities such as safeguarding network events provided by the Local Authority to ensure that the school is up to date with current practice and procedures and in order to further her continuous professional development. The DSL disseminates the information and changes to current safeguarding policies or procedures to staff and governors regularly, and at least annually, through staff meetings, governor meetings and written reports.

16.3 Governors

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

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

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

16.4 Recruitment – interview panels

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

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

16.5 Staff who have contact with pupils and families

All Early Years staff and staff who have who have regular contact with children and families have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Safeguarding Supervision takes place half-termly for those members of staff who work specifically with children and families who are currently being supported by Social Care, the Family Support Partnership or as the result of an Early Help assessment by school.

17. Monitoring arrangements

This policy will be reviewed **annually** by Debbie Bastin, Deputy Headteacher and DSL. At every review, it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- › Anti-bullying
- › Attendance
- › Behaviour
- › Child-on-Child abuse
- › Code of conduct
- › Complaints
- › Contacts and Collections
- › Equality
- › First Aid
- › Health and safety
- › Looked-after and previously looked-after children
- › Low-level Concerns
- › Mobile Devices Acceptable Use
- › Online safety
- › Personal and Intimate Care
- › Relationships and sex education curriculum
- › Safer Recruitment
- › Social Networking
- › Whistle-Blowing

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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Appendix 2. Safer recruitment and selection

- › The school pays full regard to 'Keeping Children Safe in Education' (DfE 2025). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions.

- › S128 checks are completed on those members of staff and Governors taking part in management of the school. A section 128 would prohibit someone from:

'becoming a Governor on any Governing Body in an independent school, academy or free school that retains or has been delegated any management responsibilities.'

- › All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children.
- › The Governor with responsibility for Safeguarding and the Headteacher, Edel Gillespie along with Debbie Bastin, Debbie Egbaran, Lisa Scott, Claire Sheehan and Teresa Brooks have all undertaken Safer Recruitment training. One of the above will be involved in all staff / volunteer recruitment processes and sit on the recruitment panel.
- › The school is committed to keeping an up to date Single Central Record (SCR) which covers the following people: All staff (including supply staff and teacher trainees on salaried routes) who work at the school,
- › All others who work in regular contact with children in the school, including Governors and volunteers,
- › The Single Central Record (SCR) records that the following safer recruitment checks have been carried out, the date on which the checks are completed and by whom.

The checks include:

- an identity check,
 - a barred list check,
 - an enhanced DBS check/certificate,
 - a prohibition from teaching check,
 - further checks on people who have lived or worked outside the UK,
 - a check for professional qualifications,
 - a check to establish the person's right to work in the United Kingdom.
 - at least two written references
- › If we have staff from an agency or third-party organisation, we obtain written notification from the agency that they have carried out the appropriate checks, and we ensure that we check the identification of the person presenting themselves for work and that this is the same person on whom the checks have been carried out.
 - › Every member of the school's Governing Body has an enhanced criminal record certificate from the DBS.
 - › We carry out online searches for shortlisted candidates as part of due diligence in our recruitment process, (as per KCSIE, paragraph 220):
 - The searches are conducted by the Office Manager
 - Shortlisted candidates are informed that online searches will be part of the due diligence checks.
 - This is recorded on the application form.
 - The process will be consistent, transparent, and fair and reflected within the Safer Recruitment Policy.
 - All decision making, and the rationale behind it, during the process will be documented for transparency and accountability.
 - › The school does not ask visitors to the school, such as relatives attending concerts or sports days, to provide DBS certificates but the Headteacher and senior leadership team use their professional judgement to determine where and when such visitors need to be escorted and supervised. They have decided that while some professionals, who are visitors to the school, such as school nurses, counsellors

and peripatetic music teachers may not need such supervision, most visitors to the school need to be escorted at all times while they are in the school.

Appendix 3: specific safeguarding issues

This appendix is based on the advice in Keeping Children Safe in Education, in particular annex B

Children who are absent from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation

- › Suffering from changes in emotional wellbeing
- › Misusing drugs and alcohol
- › Going missing for periods of time or regularly coming home late
- › Regularly missing school or education
- › Not taking part in education

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

Child sexual exploitation

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

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

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

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

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

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

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

Child-on-child abuse

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

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

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

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- › Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- › Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- › Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- › Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- › Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- › Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- › Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

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

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

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

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

Homelessness

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

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

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

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

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

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

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

FGM

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

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

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

The DSL will:

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

Preventing radicalisation

- › **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- › **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- › **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves

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

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

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

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

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

Serious violence

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

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

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

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

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

Checking the identity and suitability of visitors

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

They are required to turn their mobile phones off and place them out of sight whilst in the building.

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

Visitors are expected to sign the visitors' book and wear a visitor's badge on a lanyard or a sticker identifying them as a visitor.

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

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite any speaker into the school who is known to disseminate extremist views, and will carry out appropriate

checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Please cross reference our Contacts and Collections policy

Appendix 4: Dealing with a disclosure

DEALING WITH A DISCLOSURE OF ABUSE- reminders.

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that I will try to help but let the child know that I will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that I believe them. Children very rarely lie about abuse, but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information. Remember TED- Tell, Explain, Describe.
- Listen and remember.
- Check that I have understood correctly what the child is trying to tell me.
- Praise the child for telling me. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told me. It is essential to record all I have heard.
- At the end of the conversation, tell the child again who I am going to tell and why that person or those people need to know.
- As soon as I can afterwards, make a detailed record of the conversation using the child's own language. Include any questions I may have asked. Do not add any opinions or interpretations.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.
Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Designated Safeguarding Lead.
Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from our Designated Safeguarding Lead.

LEAGRAVE PRIMARY SCHOOL

Address: Strangers Way, Luton, Bedfordshire LU4 9ND
Telephone: 01582 571951
Email: admin@leagraveprimary.co.uk
Website: www.leagraveprimary.co.uk
Headteacher: Mrs Edel Gillespie



‘STRIVING FOR EXCELLENCE, LEARNING FOR LIFE’

Safeguarding Children at Leagrave Primary School

Everyone at Leagrave Primary School works together to ensure that children are kept safe by contributing to:

- providing a safe environment in which children can learn,
- identifying children who are suffering or likely to suffer significant harm,
- taking appropriate action with the aim of making sure they are safe at home and school.

Guidelines for visiting professionals who work directly with children in the school.

If you think a child is in need because they are suffering or likely to suffer significant harm, you must do the following...

- 1 Make a note of what you have seen or been told.
- 2 Do not make assumptions- keep an open mind.
- 3 Do not ask leading questions and do not cross examine the child. Remember **T.E.D.** (ask the child to **Tell** you about, **Explain...**, or **Describe**).
- 4 Do not physically examine the child (In an emergency a First Aider may do this)
- 5 Never promise to keep ‘secrets.’ Explain that you can listen to the child, but make it clear that if they are in danger of harm you will have to seek advice because you have a duty to protect children. Reassure them that they will be helped and kept safe.
- 6 Be discreet- do not say anything that may place the child or yourself at risk.
- 7 Act quickly. Report your concerns to the Designated Safeguarding Lead, Debbie Bastin (ext 202) The Administration Team at main Reception will be able to locate her for you if you do not know where to find her.
- 8 Remember confidentiality. Please do not discuss your concerns with anyone else.
- 9 If the concern relates to a member of staff it must be shared with the Headteacher as soon as possible and nothing should be said to those who were involved.

**Know our procedures- they are your boundaries.
They protect you and they protect the children.**

The school’s Safeguarding Policy contains more detailed information about safeguarding children and can be provided on request or viewed on our Website. All staff, visitors and volunteers should protect themselves by following these guidelines. Safe professional practice is vital for ensuring you do not put yourself at risk.



Leagrave Primary School

Striving For Excellence Learning for Life

Child Protection & Safeguarding Procedures for Visitors.

(The Safeguarding Policy is available on the school's website or by request)

All staff, visitors and volunteers have a responsibility to take prompt action if they are concerned about the safety or welfare of a child. Concerns of a non-urgent or low-level nature must still be reported without delay as they may be part of a bigger picture of concern. Any concern about, or raised by, a child must be taken seriously.

If a visitor or volunteer has any concerns about the safety or welfare of a child they should report it to the school's Designated Safeguarding Lead or the Headteacher.

Headteacher
Mrs E. Gillespie
01582 571951

Designated Safeguarding Lead
Mrs Debbie Bastin
01582 571951 ext 202

Safeguarding Reminders

* All visitors must sign in at the school's reception and visitor badges must be worn and be visible at all times.

* Staff and visitors may only use the designated staff/ visitor or disabled toilets.

* Promises of confidentiality must never be made to pupils who make any kind of disclosure.

* Any concerns must be reported to the Designated Safeguarding Lead as soon as possible, and must not be discussed with anyone else.

Further information can be found in our Safeguarding Policy (available from Reception or on the Website)

Useful Contacts

Luton's Multi Agency Safeguarding Hub (MASH).....01582 547653

Luton's Safeguarding Children's Board.....www.lutonlscb.org.uk

Appendix 7: Information Sharing

Information Sharing advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

This HM Government advice is non-statutory, and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children and young people and promotes their well-being.

Appendix 8: Concerns about a vulnerable child

This guidance does not deal with arrangements for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance. This guidance has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government *Information sharing guidance for practitioners and managers* published in March 2015.

Leagrave Primary School Vulnerable Child Referral



To be completed by referrer and passed to Inclusion Manager

Name of child:	DOB:	Class:
Referred by:	Date of referral:	Ethnic Origin:
Attendance:	Reading Age:	Spelling Age:
Other Agencies involved:		IEP in place: Yes/No

Tick reason for referral: Highlight Universal Indicators and attach

HEALTH		SOCIAL PRESENTATION	
EMOTIONAL AND BEHAVIOURAL		PARENTS AND CARERS	
IDENTITY		FAMILY ENVIRONMENT	
FAMILY AND SOCIAL RELATIONSHIPS		OTHER	

Support currently in place:	Evidence
What conversations have already taken place with the family? How did they respond?	
Have you put any other strategies in place to support the child?	
What information has been gathered from the child?	

Anticipated support, interventions and outcomes:

--



Leagrave Primary School **Response to Vulnerable Child Referral**

To be completed by Core Inclusion Team – copied to class teacher when completed

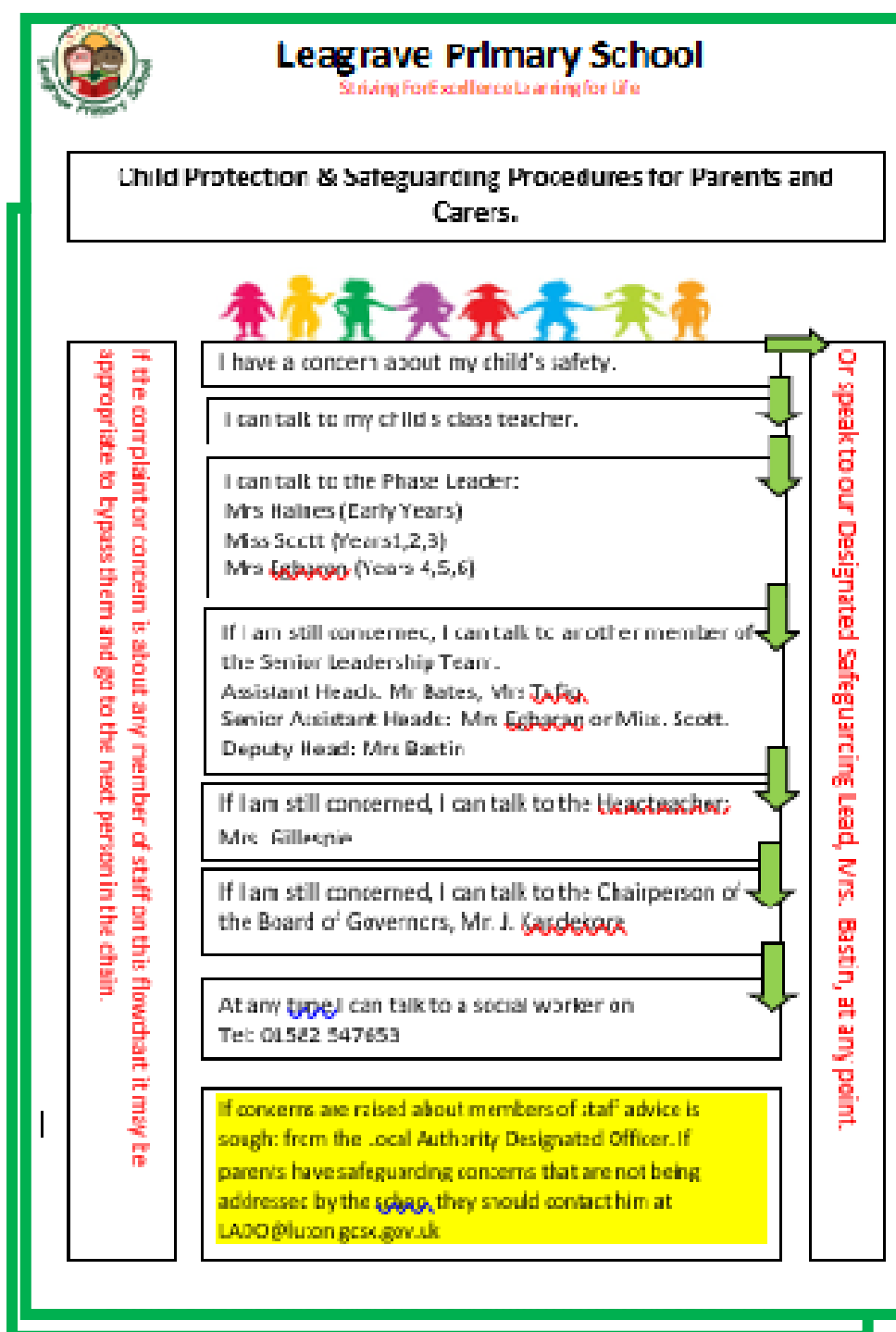
Referral reviewed by:	Date:
-----------------------	-------

1. Previous Strategies if relevant - provide details/dates as appropriate:	
<input type="checkbox"/> Discussion with parent/carers	<input type="checkbox"/> Observations by staff or other Professionals
<input type="checkbox"/> SEN Assessments completed by SENDCo	<input type="checkbox"/> Action and intervention from outside agency
<input type="checkbox"/> Early Help Assessment	<input type="checkbox"/> Involvement from Play therapist or Counsellor
<input type="checkbox"/> Class based strategies recommended by CIT	<input type="checkbox"/> Referral to stronger families
<input type="checkbox"/> Training for teacher/TA	<input type="checkbox"/> Referral to Social Care
<input type="checkbox"/> Action and intervention from school	<input type="checkbox"/> Other

2. Agreed Strategies:	
<input type="checkbox"/> Discussion with parent/carers	<input type="checkbox"/> Observations by staff or other Professionals
<input type="checkbox"/> SEN Assessments completed by SENDCo	<input type="checkbox"/> Action and intervention from outside agency
<input type="checkbox"/> Early Help Assessment	<input type="checkbox"/> Involvement from Play therapist or Counsellor
<input type="checkbox"/> Class based strategies recommended by CIT	<input type="checkbox"/> Referral to stronger families
<input type="checkbox"/> Training for teacher/TA	<input type="checkbox"/> Referral to Social Care
<input type="checkbox"/> Action and intervention from school	<input type="checkbox"/> Other

3. Next Steps:			
Action	Time scales	Key Person	Follow Up/Review

Appendix 9: When parents/carers have concerns



Appendix 10: A safeguarding recording form



LEAGRAVE PRIMARY SCHOOL

Recognise Record Respond

SAFEGUARDING CHILDREN RECORDING FORM

VERY IMPORTANT: If you consider the concern to be of an urgent nature action should be taken immediately and this recording form completed afterwards.

Child's name		Date of concern	
Your name		Job Title	

1	<p>Concern: Describe the event or observation (see reverse for body map). If the child has made a disclosure, record what the child said, using his/her own words on a piece of paper and attach to this form.</p> <div style="border: 1px solid black; height: 150px; width: 100%;"></div>
2	<p>Impact: Is there any identifiable impact on the child, i.e. their physical or emotional wellbeing?</p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>
3	<p><u>Now, take this form to the Designated Senior Member of Staff for Child Protection and Designated Safeguarding Lead</u></p>
4	<p>Discuss the concern with the Designated Person and agree what actions to take.</p> <p>They will keep this form on file and add a brief summary of the concern, impact and planned actions to a chronology sheet.</p>
5	<p><u>Agree when and how the actions will be reviewed</u></p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>
	<div style="border: 1px solid black; padding: 5px;"> <p>Today's Date (if different from above)</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> </div>

PLEASE KEEP THIS FORM SAFE – DO NOT LEAVE IT FOR OTHERS TO SEE

Appendix 11: Allegations against staff (including low-level concerns policy)

Section 1: allegations that may meet the harms threshold

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

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

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

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

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

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

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- › **False:** there is sufficient evidence to disprove the allegation
- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

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

In line with the Early Years Foundation Stage, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

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

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

Keeping Children Safe in Education states that

'As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.'

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

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

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

- › Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

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

Staff do not need to determine whether the concern is an allegation of harm or is a low-level concern. Their role is to share the concern with the Headteacher who will determine whether it is a low-level concern or whether it meets the threshold for an allegation of harm and she will then respond accordingly in line with this policy.

Sharing low-level concerns

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

We will create this culture by:

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

All low-level concerns are shared with the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern when it relates to a specific incident.

Low-level concerns must be recorded on a Low-level Concern form. (see Appendix one) These are kept in the staff room, in the DSL's office and electronically on Datapool in the Safeguarding folder)

If the Headteacher is unavailable, the form should be given to the most senior member of staff in school.

If the concern is about the Headteacher, the Chair of Governors must be contacted and a Low-level concern form must be sent to him in a sealed envelope or electronically.

Self-reporting

Occasionally, an adult within the school may find themselves in a situation that could be misinterpreted or might appear compromising to others. Equally an adult may, for whatever reason, have behaved in a way which, upon reflection, they consider may fall below the expected standards.

Self-reporting, in these circumstances, can be positive for a number of reasons; it is self-protective in that it enables a potentially difficult situation to be addressed at the earliest opportunity; it demonstrates awareness of the expected standards of behaviour; it helps to maintain an open culture where everyone recognises and aspires to the highest standards of conduct.

Recording Low-level concerns

Staff will initially be given the opportunity to share their low-level concern verbally with the Headteacher or by completing the Low-level Concern form.

If the concern is provided verbally, a record of the conversation must be made on the Low-level Concern form, as soon possible after it has taken place.

The Headteacher will use her professional judgement to determine what information may be needed for safeguarding purposes. The name of the individual sharing the concern, and their role must be stated, as should the name and role of the person about whom the concern is being raised.

The record will include brief context in which the low-level concern arose, and concise details which should be in chronological order and as precise and accurate as possible. The record must be signed, timed and dated by the person reporting the concern.

Responding to Low-level concerns

Once the Headteacher has received the low-level concern, they will do the following, but not necessarily in this order as a different sequence may be appropriate on different occasions:

- › Speak to the person who has raised the concern,
- › Speak to any potential witnesses (unless advice has been sought from the LADO and they have advised not to do so)
- › Speak to the individual about whom the concern has been raised (unless advised by the LADO not to do so)
- › Review the information and determine whether the behaviour:
 - i. Is entirely consistent with the code of conduct and the law
 - ii. Constitutes a low-level concern
 - iii. Is not serious enough to consider a referral to the LADO- but may merit consulting with and seeking advice from the LADO.
 - iv. When considered with any other low-level concerns that have previously been raised about the individual, could now meet the threshold of an allegation and should be referred to the LADO
 - v. Meets the threshold of an allegation and should be referred to the LADO

Possible outcomes for Low-level concerns

If the behaviour is not of concern and is entirely consistent with our Code of Conduct, the Headteacher will:

- › Update the individual who shared the concern.
- › Update the person about whom the concern was raised
- › Consider if further training or explanation about low-level of concerns is necessary.

If it is determined that the behaviour constitutes a low-level of concern, it will be responded to in a sensitive and proportionate way. Any further investigations will be done discreetly and on a need-to-know basis.

- Most low-level concerns are by their very nature likely to be minor.
- Some will require no more action than a conversation with the Headteacher or a senior member of staff.
- Others may be dealt with through management guidance or specific training.
- Ongoing and transparent monitoring of an individual's behavior may be appropriate such as an action plan or risk assessment being put in place which would need to be agreed to by the individual.
- Some low-level concerns may raise issues of misconduct or poor performance and this may lead to the Headteacher taking advice from our HR provider.

If a low-level concern relates to a supply agency or contractor, the concern will be raised with their employers who will respond to the concern according to their own procedures.

Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures which should then be followed where appropriate. (please see individual policies)

The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. Records will be:

- › Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- › Kept centrally in a low-levels concerns file in the School's Business Manager's Office.
- › Held securely with very limited access given only to the Headteacher, Business Manager and the Deputy Headteachers.
- › Kept in chronological order as a running record if multiple low-level concerns have been shared about an individual
- › Kept in accordance with Part 4 of KCSIE which requires schools to produce a clear and comprehensive summary of all allegations, details of how the allegations were followed up and resolved, a note of action taken and how the situation was resolved and decisions that were reached. A copy is also provided for the staff member.
- › Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the LADO.
- › Retained at least until the individual leaves employment at the school

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

When a member of staff leaves, the relevant content of the low-level concerns file may be reviewed to ensure that it still has value and to assess whether it is necessary to keep or not. This is subject to the rights of an individual to object to or seek to erase or correct records about them under data protection law.

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

Low-level Concerns and references

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

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



LEAGRAVE PRIMARY SCHOOL

'STRIVING FOR EXCELLENCE, LEARNING FOR LIFE'

LOW-LEVEL CONCERN REPORTING FORM

Name and role of adult sharing the concern:	
Name and role of adult the concern is about:	
Time and date of concern being shared:	
Time and date of concern occurring (if there is a specific incident):	
Details of concern:	
Actions taken:	
Signature of person sharing the concern:	Signature of person receiving the concern: