



Safeguarding and Child Protection Policy

Reviewed on	2026/27, Term 1	Review frequency	Annual
Next review due	2027/28, Term 1	Template Yes / No	Yes
Owner	DoES	Approved by	Board of Trustees



1. History of Policy Changes

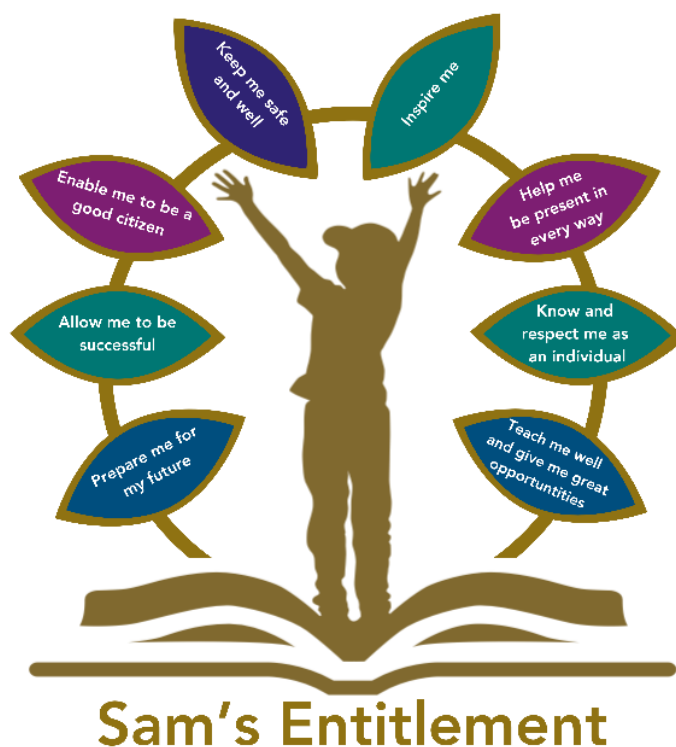
Date	Page	Change	Origin of Change
Sep 2026	5	Replaced Introduction section with new Aims section and added a standalone Scope section	Annual review and policy restructuring.
	5	Expanded Definitions	Alignment with KCSIE 2026 and emerging safeguarding risks.
	6	Significant revision of Roles and Responsibilities.	Alignment with KCSIE 2026
	11	Updated Safeguarding Legislation and Guidance section updated to reference KCSIE 2026, Working Together 2026 and the Crime and Policing Act 2026.	Legislative update.
	12	Expanded vulnerability section to include young carers, children who are pregnant/parents, children with family members in prison, and children involved in the court system.	Reflecting KCSIE 2026 vulnerable groups guidance.
	14	Split previous LGBT section into separate sections for Children who are lesbian, gay or bisexual and Children who are questioning their gender. Added detailed guidance on parental engagement, social transition requests, record keeping, toilets, changing facilities and overnight accommodation.	New safeguarding guidance and organisational approach to gender-questioning children.
	15	Expanded Child-on-Child Abuse section. Added references to AI-generated imagery, misogyny/misandry, safeguarding separation of pupils, risk assessments and DfE Suspension Guidance 2026.	KCSIE 2026 and emerging safeguarding risks.
	18	Revised CCE/CSE and Sharing Nudes and Semi-Nudes sections to include AI-generated sexual imagery, deepfakes and additional safeguarding requirements	Emerging technology and online safety risks.
	22	Replaced E-Safety and Online Safety Risks with revised Online Safety section including filtering and monitoring responsibilities, generative AI risks and the four categories of online risk (content, contact, conduct and commerce)	KCSIE 2026 requirements.
	23	Added new Handheld Devices and Cameras section outlining expectations for use of mobile phones, devices and pupil images.	Clarification of staff practice and safeguarding controls.
	25	Updated allegations management section and simplified references to supporting policies. Revised wording relating to staff allegations, whistleblowing and low-level concerns	Alignment with trust safeguarding procedures.
	26	Revised Staff and Governor Training and Safer Recruitment sections to strengthen requirements relating to safeguarding, online safety, filtering and monitoring	KCSIE 2026 compliance.
	27	Reorganised safeguarding procedures by creating separate sections for Child Protection Procedures, Notifications, Referrals, Confidentiality and Special Circumstances.	Policy simplification and template redesign.

		Removed standalone sections on LADO, Homelessness, Family Members in Prison and Court System by incorporating relevant content elsewhere.	
	31	Replaced Glossary of Types of Abuse with Four Categories of Abuse appendix and updated abuse definitions in line with KCSIE 2026.	Annual legislative review
	All	Inclusion of Trustee roles in Safeguarding.	
	Section 6	Inclusion of Link Trustee; Safeguarding role outline.	Annual review

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3. Aims

Hamwic Education Trust (HET) believe that all pupils should receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together.

This policy sets out that Gatcombe Park Primary School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all children.

Everyone working in our school has a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to practice in a way that protects them.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, resilient, valued, and respected and are encouraged to talk, believing they will be listened to. We will ensure children know there are adults at the school whom they can approach if they are worried.

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

4. Scope

This policy is for all employees working within a HET school or establishment (which for ease of reference are referred to throughout this document as 'schools') or the HET Managed Service (MS) Team.

This policy also applies to:

- All pupils and students
- All staff (teaching and support staff)
- Volunteers
- Contractors
- Visitors to the school site
- Governors
- Trustees and Members of the Trust Board

5. Definitions

- **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.
- **Alleged perpetrator(s)** and **perpetrators(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.
- **Child protection** is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or at risk of significant harm.
- **Child** refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments.
- **DSL** refers to Designated Safeguarding Lead.
- **DDSL** refers to Deputy Designated Safeguarding Lead.
- **HR** in this policy, means Hamwic Education Trust HR.
- **Local Governing Committee** in this policy, where reference is made to the Governing Committee, this means the Local Governing Committee (LGC) of the school, or the Trust in the case of a school where no Local Governing Committee is present. Where a Governing Committee is not present in a school, or numbers are low, Governors from other schools/partnerships may be used.
- **Making or sharing of nudes or semi-nudes** is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.
- **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.



- **Parent** refers to birth parents and other adults in a parenting role for example adoptive parents, stepparents, guardians, foster carers and kinship carers.
- **Safeguarding** and promoting the welfare of children means:
 - Providing help and support to meet the needs of children as soon as problems emerge
 - Protecting children from maltreatment whether that is within or outside the home, including online
 - Preventing impairment of children's mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes
- The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
 - The local authority (LA)
 - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - The chief officer of police for an area in the LA area.
- **School**, when we refer to school if the setting includes a nursery this is included in the definition.
- The term **staff** applies to all those working for or on behalf of the school, full-time or part-time, in either a paid or voluntary capacity. This also includes parents and governors.
- **Victim** refers to the person who is adversely affected by a stressful or distressing situation or harmful or humiliating act. (It is important that we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way.)

6. Roles and Responsibilities

We recognise that all staff, Trustees and LGC Governors have a full and active part to play in ensuring there is a culture of safeguarding that is effective in protecting our pupils from harm. We recognise that staff anxiety around child protection can compromise good practice and so have established clear lines of accountability, training, advice to support the process and individual staff within that process.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. Staff understand that they all have a key role to play in identifying concerns early and provide help for children where necessary through referral to Family Help services or Children's Services at the Local Authority.

During term time, the Designated Safeguarding Lead (DSL) will be available during school hours for staff to discuss any safeguarding concerns. The Designated Safeguarding Lead (DSL) is:

Name	Ben Simpson
Contact details email:	bsimpson@gatcombprimary.co.uk
Tel:	0239 269 4412



The DSL can also be contacted out of school hours, if necessary via email.

When the DSL is absent, the deputies will act as cover. The Deputy DSL(s) is/are:

Name	Esme Webber Euan Bradshaw Jade Sweeney Kayleigh Crowhurst
Contact details email:	ewebber@gatcombeprimary.co.uk ebadshaw@gatcombeprimary.co.uk jsweeney@gatcombeprimary.co.uk kcrowhurst@gatcombeprimary.co.uk
Tel:	0239 269 4412

The Link Trustee; Safeguarding is:

Name	Jennie White
Contact email	Jennie.white@hamwic.org

We have a shared mailbox so other members of staff can act on safeguarding concerns.

The Safeguarding Governor is:

Name	Tinu Okubadejo
Contact details email:	tokubadejo@gatcombeprimary.co.uk
Tel:	0239 269 4412

The School Leader is:

Name	Ben Simpson
Contact details email:	bsimpson@gatcombeprimary.co.uk
Tel:	0239 269 4412

The HET Head of Safeguarding is:

Name	Julie Prince
Contact details email:	julie.prince@hamwic.org
Tel:	07719 528844

The Designated Safeguarding Lead (DSL):

The Designated Safeguarding Lead is a member of the Senior Leadership Team (SLT) and takes **lead responsibility** for safeguarding and child protection (including online safety) in the school.

The DSL duties include:

- Where applicable, keeping the School Leader (SL) informed of any issues.
- Ensuring child protection policies are known, understood, and used appropriately by staff.
- Working to ensure that HET's child protection policies are contextualised for the school and that school's procedures are regularly reviewed.
- Acting as a source of support, advice, and expertise for all staff on child protection and safeguarding matters.
- Liaising with the SL regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and being aware of the requirement for Children to have an Appropriate Adult in relevant circumstances.
- Acting as a point of contact with the safeguarding partners.



- Making and managing referrals to children's social care, the police, or other agencies.
- Keeping detailed, accurate, secure written records of concerns, discussions, and decisions made including the rationale for those decisions (including where referrals were or were not made).
- Taking part in strategy discussions, and inter-agency meetings.
- Liaising with the 'case manager' and the designated officer(s) at the local authority if allegations are made against staff.
- Making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements.
 - Transferring the child protection file to a child's new school.
 - Work with the SL to ensure that the relevant staffing ratios are met, where applicable.
 - Work with the SL to ensure that each EYFS child is assigned a key person.

The Deputy Designated Safeguarding Lead(s):

Our Deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL

The School Leader

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

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

The Safeguarding Link Trustee

As the Trust Board's Link on safeguarding and child protection, the Link Trustee; Safeguarding is responsible for:

- staying up to date on relevant guidance and policy (including local guidance), ensuring the Board are made aware of any changes to their safeguarding responsibilities
- reporting to the Board following visit/engagement with the DSL and any visits/interactions with staff and pupils
- Ensuring that safeguarding is given suitable coverage and prominence within the Board's strategic discussions

- feeding into Board discussions, ensuring that decision making is based on a sound understanding of both the legal requirements and the school/trust procedures and culture
- ensuring that the results of safeguarding audits are shared with the Board and any concerns addressed

The Safeguarding Governor

The role of the Safeguarding Governor is to provide support and challenge to the DSL and the leadership of the school on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- Understanding the requirements of the Governance Handbook and Keeping Children Safe in Education (KCSIE) 2026.
- Supporting and challenging the DSL on the standards of safeguarding at the school.
- Confirming that consistent and compliant safeguarding practice takes place across the school.
- Reporting to the Board of Trustees about the standard of safeguarding in the school.

The DSL and the Safeguarding Governor meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the school. Governors on LGCs will review the *school-specific* elements of the policy after the Board level policy template has been reviewed and approved.

Governors will refer to the HET Safeguarding Review document as a template to support their own monitoring. The Chair of the LGC receives reports of allegations against the SL and acts on the behalf of the LGC. Trustees and Governors are aware of the duties set out in KCSIE 2026 for Trust Board and LGC responsibilities for safeguarding. A record of all Trustees and Governors who have read and understood relevant sections of KCSIE 2026 is held on the GovernorHub portal. All Governors are required to read KCSIE 2026 in full and this is evidenced/recorded on their training record in GovernorHub.

All staff at our School

All staff will:

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

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy and other relevant policies, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies. Alongside the safeguarding response to children who go missing from education/who are absent from education.
- HET's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment



- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection.

7. Our Strong Safeguarding Culture

Why it is important

Safeguarding is everyone's responsibility and it is the duty of HET and the school to safeguard and promote the welfare of children. 'Children' includes everyone under the age of 18. This is our core safeguarding principle.

In adhering to this principle, we focus on providing a safe and welcoming environment for all our children regardless of age, ability, culture, race, language, religion, gender identity, or sexual identity. All our children have equal rights to support and protection.

One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, Trustees and Governors, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law, guidance, and best practice.



This policy should be read alongside our other safeguarding policies, which are set out below.

What it means for our pupils

We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans, which provide additional support to the child. It also includes contributing to broader, multi-agency strategic discussions about safeguarding children.

All our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issue will receive appropriate support.

Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful, and safe behaviour among pupils and we set a good example by conducting ourselves appropriately. Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' attendance and/or behaviour and knowing that these changes may be signs of abuse, neglect, or exploitation. Challenging behaviour may be an indicator of abuse.

All our staff will reassure children that their concerns and disclosures will be taken seriously, and that they will be supported and kept safe.

8. Safeguarding Legislation and Guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguarding Children (2026)
- What to do if you're worried a child is being abused (2015)
- Prevent Duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Equalities Act 2010
- The Teacher Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Crime and Policing Act 2026
- Statutory Framework for the Early Years Foundation Stage (EYFS)

9. Children who may be particularly vulnerable

Some children are at greater risk of abuse, neglect, and exploitation. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that all our pupils receive equal protection, we give special consideration to children who:



- Are vulnerable because of their race, ethnicity, religion, special educational needs, disability, gender identity or sexuality.
- Are young carers.
- Are pregnant or are parents themselves.
- Are involved in the court system or have a family member in prison.
- Are vulnerable to being bullied or engaging in bullying.
- Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- Live in chaotic or unsupportive home situations.
- Live transient lifestyles or live away from home or in temporary accommodation.
- Are affected by parental substance abuse, domestic abuse, or parental mental health needs.
- Do not have English as a first language.
- Experience or have experienced bereavement or mental health difficulties.
- Are in care or privately fostered or have returned home to their family from care.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.

10. Children with Special Educational Needs, Disabilities or Health Issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect, and exploitation in this group of children, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care, and
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

11. Children Who are Absent from Education

Children being absent from education for prolonged periods, on an increasing basis and/or on repeat occasions, and children with unexplainable and/or persistent absences from education, can be an indicator of abuse, neglect and exploitation, including sexual abuse or exploitation, trafficking, modern slavery, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

We closely monitor attendance, absence, and exclusions and our DSL will take appropriate and proactive action including notifying the local authority, particularly where children go



missing on repeated occasions, on an increasing basis and/or are missing for periods during the school day.

12. Alternative Provision

Where a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure we are satisfied that the placement meets the pupil's needs.

13. Mental Health

Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

All staff are aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation, and that in some cases they can develop into safeguarding concerns. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour, and education.

All staff are aware that there are potential warning signs when a child is struggling with their mental health. These include:

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

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy who will alert other relevant agencies as necessary.

14. Children Who are Lesbian, Gay or Bisexual

The fact that a child or a young person may be lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. Unfortunately, children who are lesbian, gay, or bisexual, or are simply perceived to be lesbian, gay, or bisexual, can be vulnerable to discriminatory bullying by other children. The risk to these children can be compounded where children who are lesbian, gay, or bisexual lack a trusted adult with whom they can be open.

Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

15. Children Who are Questioning Their Gender

The school will take a sensitive, child-centred approach to pupils who are questioning their gender identity or who have the protected characteristic of gender reassignment, having regard at all times to the welfare of the individual pupil and the welfare of other pupils.



The school will respect both gender-critical and gender-affirming beliefs held within the school community and will not tolerate bullying, harassment, or discrimination in connection with any such beliefs.

The school will not initiate any social transition actions. Where a child, parent, or carer requests support in relation to gender identity, including any form of social transition (such as changes to name, pronouns, or presentation), the school will only implement any changes following a school-level decision made in accordance with the following process:

- **DSL involvement:** The designated safeguarding lead ("DSL") will be informed and involved in the decision-making process from the outset, as gender-related requests may intersect with safeguarding considerations.
- **Parental engagement:** Parents and carers will be engaged as a matter of priority and their views treated with importance. The school will not implement any social transition arrangements without parental knowledge and engagement, save in the exceptional circumstances described in paragraph 10.3.3 below.
- **Exception to parental engagement:** Where staff have reasonable grounds to conclude that involving parents or carers would create a greater risk of harm to the child, the DSL will determine what safeguarding action is appropriate before parents are contacted and before any decision is taken. Any decision to proceed without parental engagement will be documented with clear reasons.
- **Professional advice:** Where appropriate, the school will seek advice from relevant professionals, which may include the school's special educational needs coordinator ("SENCO"), relevant health professionals, or the local authority designated officer ("LADO") where applicable. The school will be alert to the possibility that gender-questioning presentations may co-occur with, or be influenced by, other factors including neuro-developmental conditions, mental health difficulties, or other needs.
- **Cautious approach:** The Trust will take a careful and considered approach, recognising that social transition is an active intervention with potentially significant consequences. In primary schools, support for full social transition will be agreed only in very rare circumstances.
- **Record-keeping:** All discussions, decisions, and the reasons for those decisions will be recorded in writing and stored securely and confidentially. Records will be kept under review and revisited if circumstances change.
- **Review:** Any agreed arrangements will be subject to periodic review. Where circumstances change, the DSL will be informed immediately and arrangements will be reassessed.

The school will ensure that its facilities arrangements comply with its legal obligations in relation to biological sex and with its safeguarding duties.

- **Toilets:** The school will not permit a child to use toilet facilities designated for the opposite biological sex. Where a pupil does not wish to use toilet facilities designated for their biological sex, the school will consider whether an alternative arrangement, such as a self-contained individual toilet, can be provided without compromising single-sex provision or the safety, comfort, privacy, or dignity of the pupil or other pupils. Any such arrangement will be recorded and reviewed regularly.
- **Changing rooms and showers:** The school will not permit a pupil aged 11 or over to undress in the presence of a pupil of the opposite biological sex and will not permit access to changing rooms or shower facilities designated for the opposite biological sex as part of any social transition arrangements. Where a pupil does not wish to use facilities designated for their biological sex, the school will consider alternative arrangements that do not compromise single-sex provision, and will keep clear records, communicate appropriately, and review regularly.



- **Overnight accommodation:** The school will not permit a pupil to share overnight accommodation with a pupil of the opposite biological sex. Where a pupil does not wish to share accommodation with a pupil of the same biological sex, the school will seek to identify alternative arrangements where possible without compromising safety, comfort, privacy, or dignity, and will document those arrangements.

For safeguarding purposes, relevant staff will be made aware of a pupil's biological sex in all cases, and a pupil's biological sex will be recorded accurately wherever it is recorded by the school.

16. Child-on-Child Abuse

Child-on-child abuse – children harming other children – is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. The school takes a zero-tolerance approach to sexual harassment and sexual violence; it is never acceptable, and it will not be tolerated. It is more likely that boys will be perpetrators of child-on-child abuse and girls' victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

All staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator, and they are clear about the school's policy and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.

Child-on-child abuse can take many forms, including:

- **Physical abuse** such as shaking, hitting, biting, kicking or hair pulling.
- **Bullying**, including cyberbullying, prejudice-based and discriminatory bullying.
- **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 and which may include misogyny/misandry.
- Serious physical assault and harm, or the threat of harm with a weapon.
- **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.
- **Up skirting**, which involves taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm.
- **Consensual and non-consensual making or sharing of nude and semi-nude images and/or videos** (including those generated by AI) and including pressuring others to share sexual content.
- **Abuse in intimate personal relationships between children (also known as teenage relationship abuse)** – such as a pattern of actual or threatened acts of physical, sexual or emotional abuse.
- **Initiation/hazing** – used to induct newcomers into sports teams or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

Minimising Risk

We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
- Using assemblies to outline acceptable and unacceptable behaviour.
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities.
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.
- If there is an allegation of harm by one child against another which might require physically separating a child from one or other children, the school can temporarily forbid a child from attending the school premises to minimise risk. This is not exclusion on disciplinary grounds but is a separation of pupils for safeguarding purposes. This will only occur when separating pupils is essential, and there isn't a practical way to allow one or more pupils involved to remain on school premises. Decisions on this will be made on a case-by-case basis with the DSL taking a lead role (reference DfE School Suspensions and Permanent Exclusion guidance July 2026).

Alongside this, we will ensure school staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL.

Investigating Allegations



All allegations of child-on-child abuse should be passed to the DSL immediately who will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Record** - all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the school's child **protection** and safeguarding systems and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached, and the outcome.

Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2026. The DSL will decide on a case-by-case basis whether to carry out an immediate risk and needs assessment.

Reports of rape or assault by penetration are especially serious. While the school/trust establishes the facts and liaises with children's social care and the police, the alleged perpetrator(s) may be removed from any shared classes with the victim. The school/trust will also consider how to maintain a reasonable physical separation between the victim and alleged perpetrator(s) across school, including before or after school-based activities, and on transport to and from the school.

Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy.

To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse:

At Gatcombe Park Primary School, we are committed to ensuring that all children know how to seek help and report any worries, concerns, or safeguarding issues. Children can report a concern in a number of ways, including:

- **Speaking directly to a trusted adult or member of staff.** All staff are trained to listen carefully, take children seriously, and respond appropriately to any safeguarding concern.
- **Using the school's worry box/post system.** Children may write, draw, or leave a message describing a concern, worry, or issue they would like support with. This system is available to all pupils and can be used when a child finds it difficult to speak to an adult directly.
- **Approaching a Designated Safeguarding Lead (DSL) or Deputy DSL.** Children are regularly reminded who the safeguarding team are and how they can access support.

Messages placed in the worry box/post system are checked regularly by a member of the safeguarding team, usually a DSL or Deputy DSL. Any concerns raised are reviewed promptly and appropriate action is taken in line with the school's safeguarding procedures.



Where necessary, children will be followed up sensitively to ensure they receive the support and protection they need.

The school actively promotes a culture where children feel safe, listened to, and confident that their concerns will be taken seriously.

Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the pupil who has been harmed will depend on their particular circumstance, and the nature of the abuse. The support we provide could include counselling and mentoring or restorative justice work.

Support may also be required for the pupil who caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil, and/or change behaviours. The consequences for the harm caused or intended will be addressed.

17. Serious Violence

Serious violence is a continuing safeguarding concern which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and criminal exploitation. All staff are aware of the signs that a child may be at risk of or involved in serious violence, including:

- An increased absence from school or college or a significant decline in educational performance.
- A change in friendships or relationships with older individuals or groups.
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

18. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:



- Age.
- Gender.
- Sexual identity.
- Cognitive ability.
- Physical strength.
- Status.
- Access to economic or other resources.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can also be perpetrated by an organised network or gang, and the victim may identify as being part of this group. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.

Child Criminal Exploitation (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys, and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE indicators

CCE indicators can include children who:

- a) Appear with unexplained gifts or new possessions.
- b) Associate with other young people involved in exploitation.
- c) Suffer from changes in emotional well-being.
- d) Misuse drugs or alcohol.
- e) Go missing for periods of time or regularly return home late.
- f) Regularly or increasingly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to



look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. CSE can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

CSE indicators

The above indicators can also be indicators of **CSE**, as can children who:

- a) Have older boyfriends.
- b) Suffer sexually transmitted infections or become pregnant.

We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

Victims of criminal and sexual exploitation can be boys or girls, and it can have an adverse impact on a child's physical and emotional health.

All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims. County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 10.1 of this policy.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 10.3 of this policy, with the main indicator being missing episodes from home and/or school. Additional specific indicators that may be present where a child is criminally exploited include children who:

- Go missing and are subsequently found in areas away from home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.



- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation with which they have no connection or in a hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

All staff are aware of indicators that children are at risk from or are experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

19. Sharing Nudes and Semi-nudes

Sharing photos, videos, and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the creation, sending, or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps, or forums, or carried out offline between devices via services like Apple's AirDrop.

Images may be taken or created by the child themselves or by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude online.
- Images created or shared are used to abuse peers, e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

The school takes a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation, or vulnerability.

All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.

- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

School staff must **not**:

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

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in February 2024 - [UKCIS advice 2024](#) . The school will have regard to this advice when managing these issues.

20. Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. Our filtering and monitoring systems also prevent access to harmful and inappropriate content accessed through generative AI tools and products.

These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least every academic year) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe.

We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online. Online safety risks can be categorised into four areas of risk:

- **Content:** Being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact:** Being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure and adults posing as children or young adults to groom or exploit children.

- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images, including those generated using AI and online bullying.
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.

21. Handheld Devices and Cameras

HET has a separate policy regarding the safe use of mobile phones and cameras. This includes:

- Personal devices are only to be used by staff when on a designated break away from the pupils. At all other times, personal devices are to be switched off.
- HET devices are only to be used by staff for work purposes.
- Photographs and videos of the pupils are only to be taken on school devices.
- Images of the pupils will only be used in accordance with the HET Data Protection policy.

22. Domestic Abuse

The Domestic Abuse Act 2021 introduced a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear, or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality, or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse. Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. The police will also notify us if they have reasonable grounds to believe a child may be a victim of domestic abuse. This ensures that the school has up to date safeguarding information about the child.

All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.



23. Honour or Faith-based Abuse

Honour or faith-based abuse (HBA) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.

If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

Female genital mutilation

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.
- FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.

Forced marriage

- A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual, and emotional pressure or abuse.
- Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.
- Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.
- Forced marriage is not the same as arranged marriage, which is common in many cultures.
- If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

24. Radicalisation and Extremism

Extremism is defined as vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of a person legitimising support for, or use of terrorist violence.



Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions, and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

25. Staff/Pupil Relationships

Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18. We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.

Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

26. Safeguarding Concerns and Allegations Made About Staff, Including Supply Teachers, Volunteers, and Contractors

If a safeguarding concern or allegation is made about a member of staff, supply teacher, volunteer, or contractor, or relates to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children our set procedures must be followed.

Our safeguarding concerns and allegations made about staff, supply teachers, volunteers, and contractors' procedure can be accessed here [[Managing Concerns and Allegations against Employees Jun 25-28.pdf](#)] and the full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2026.

Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

27. Whistleblowing if you have concerns about a colleague

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the School Leader, unless the complaint is about the School Leader, in which case concern should be reported to the LGC Chair.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

HET's Whistleblowing policy [[HET Whistleblowing Policy.pdf](#)] allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.



28. Low-Level Concerns

This applies to all concerns (including allegations) about members of staff, including supply teachers, trainee teachers, volunteers and contractors, which do not meet the harm threshold.

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.

The procedure for managing low level concerns is set out in Part Two of the HET policy, Managing Concerns and Allegations Against Employees, Agency Staff, Contractors and Volunteers (see link above).

29. Staff, Trustee and Governor training

Our staff receive appropriate safeguarding and child protection training (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils.

New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff code of conduct, how to report and record concerns and information about our designated safeguarding lead and deputy DSLs. Our Trustees and Governors receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

Our Link Trustee; Safeguarding Trustee and LGC Safeguarding Governors receive additional training to empower them to support and challenge the designated safeguarding lead and support the delivery of high-quality safeguarding across HET.

30. Safer Recruitment

The LGC and SLT are responsible for ensuring that we follow recruitment procedures which help to deter, reject, or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications, and work history in accordance with Keeping Children Safe in Education 2026 and the local safeguarding partner arrangements.



All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification. We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and request DBS checks where required by Keeping Children Safe in Education 2026. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains a Single Central Record of the recruitment checks. Our Recruitment Policy and Procedures can be accessed here [[recruitment-policy-may-24-27.pdf](#)].

31. Site Security

Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times.

32. Child Protection Procedures

Recognising abuse

- Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.
- Keeping Children Safe in Education (KCSIE) 2026 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse and neglect.

Taking action

Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the child, if necessary, call 999.
- Complete a record of concern form and report your concern to the DSL as soon as possible.
- Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family.

If you are concerned about a pupil's welfare

- Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.



- If the pupil does reveal that they are being harmed, staff should follow the advice below.
- Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or are being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

If a pupil discloses to you

If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- Remain calm and not overreact.
- Allow them to speak freely.
- Not be afraid of silences.
- Not ask investigative questions
 - Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Not automatically offer physical touch as comfort.
- Let the pupil know that in order to help them they must pass the information on to the DSL.
- Not promise to keep it a secret.
- Tell the pupil what will happen next and give them an opportunity to ask questions about what will happen next.
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it.
- Report verbally to the DSL as soon as possible, even if the child has promised to do it by themselves.
- Let the pupil know when they can expect to be updated or receive more information, emphasising that the pupil can talk to them or the DSL at any time.

Bear in mind that some children may:

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

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

33. Notifying Parents

The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are notified.



34. Referral to Children's Social Care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

35. Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the designated safeguarding lead, the deputies, the School Leader or the LGC Chair are not available, and a referral is required immediately.

36. Confidentiality and sharing information

Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead, School Leader, or LGC Chair.

Sharing information

- The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent and will record the reason for deciding to do so.
- Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate, and accurate.
- Information sharing decisions will be recorded, whether or not the decision is taken to share.
- The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer.

Storing information

Child protection information will be stored separately from the pupil's school file, and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our Records and Retention policy; this is available to parents and pupils on request.

37. Special Circumstances

Looked after Children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the

DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Children who have a Social Worker

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

Work experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience, which are in accordance with statutory guidance.

Children staying with host families

The school may make arrangements for pupils to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the Keeping Children Safe in Education 2026 to ensure hosting arrangements are as safe as possible.

Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils stay with host families abroad, we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our designated safeguarding lead will ensure the arrangements are sufficient to safeguard our pupils and will include ensuring pupils understand who to contact should an emergency occur, or a situation arise, which makes them feel uncomfortable. We will also make parents aware of these arrangements.

Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL, and the school will notify the local authority of the circumstances.

38. Link to Other HET Policies

- Attendance policy.
- Behaviour policy.
- Complaints policy and procedure.
- Data Protection policy.
- Equality, Diversity and Inclusion policy
- Grievance and Disciplinary policy.
- Health and Safety policy.



- Intimate Care policy.
 - Managing Concerns and Allegations Against Employees, Agency Staff, Contractors and Volunteers policy
- Mobile phone policy (school).
- Online Safety policy.
- Parent and Visitor Code of Conduct.
- Physical intervention and the use of reasonable force policy.
- Recruitment and selection policy.
- RSE policy for primary and secondary schools.
- SEND policy.
- Social Media policy.
- Staff code of conduct.
- Whistleblowing policy.

39. Appendix One – Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and neglect and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events that can be covered by one definition or label.

In most cases, multiple issues will overlap with one another. All staff are also aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.

Physical abuse

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

Indicators of physical abuse

The following may be indicators of physical abuse:

- Have bruises, bleeding, burns, bites, fractures or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Be concerned about changing for PE or swimming.
- An injury that is not consistent with the account given.
- Symptoms of drug or alcohol intoxication or poisoning.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying.
- Isolation from peers.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators of emotional abuse

The following may be indicators of emotional abuse:



- The child consistently describes him/herself in negative ways.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Inappropriate emotional responses, fantasies.
- Self-harm.
- Drug or solvent abuse.
- Running away.
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

Sexual Abuse

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

Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Aggressive behaviour including sexual harassment or molestation.
- Reluctance to undress for PE or swimming.
- Anal or vaginal discharge, soreness, or scratching.
- Bruises or scratches in the genital area.
- Reluctance to go home.
- Refusal to communicate.
- Depression or withdrawal.
- Isolation from peer group.
- Eating disorders, for example anorexia nervosa and bulimia.
- Self-harm.
- Substance abuse.
- Acquiring gifts such as money or a mobile phone from new 'friends'.

Neglect

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

Indicators of neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food.
- Frequent tiredness.
- Frequently dirty or unkempt.
- Poor attendance or often late.
- Poor concentration.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones or to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is left at home alone or with inappropriate carers.