

KIRKHAM GRAMMAR SCHOOL

POLICY DOCUMENT

CHILD PROTECTION & SAFEGUARDING

This is a whole-school policy and is applicable to Kirkham Grammar Senior School (KGS) and Kirkham Grammar Junior, Infant, Nursery and Pre-School (KGJS)

The reference to 'Head' throughout this document relates to the KGS Head and the KGJS Headmistress.

Policy number: 9	Date last reviewed: September 2026	Next review: September 2027
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1. INTRODUCTION

Kirkham Grammar School fully recognises the contribution it can make to protect children from harm, both online & offline, and to support and promote the welfare of all children who are pupils at the school. Kirkham Grammar School is a co-educational, independent day and boarding school, committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil. The pupil community includes young people from surrounding areas within Lancashire and includes a small number from surrounding counties and overseas who reside in the boarding house. This policy applies to all stakeholders; this includes pupils, staff, parents, governors, volunteers, placement students and visitors.

The school implements a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. It is recognised that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. The school rejects the use or threat of corporal punishment by teachers or parents (as a punishment on their children for misbehaving in school). Threats to use corporal punishment may constitute an assault and the use of corporal punishment on children in schools would be deemed a criminal offence.

This policy will give clear direction to all stakeholders about expectations and legal and moral responsibility to safeguard and promote the welfare of all children at the school.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing body, the Head, staff and all stakeholders understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the Designated Safeguarding Lead (DSL). In addition, to ensure that staff are aware that **ANYONE** can make a referral to the **Children's Social Care Emergency Duty Team 0300 1236720**.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, exploitation or radicalisation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Endeavour to provide a safe and welcoming environment where pupils are respected and valued; where the voice of the pupil is listened to and is paramount.
- Where it is believed that a pupil is at risk of or is suffering significant harm, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements.

1.2 DEFINITIONS

Whilst the terms "**children**" and "**child**" refer to anyone under the age of 18, the purpose of this safeguarding policy is to ensure **every pupil** at Kirkham Grammar School is safe and protected from harm. The Department for Education (DfE) 'Keeping Children Safe in Education' (**September 2026**), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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 of 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; and
- Taking action to enable all children to have the best outcomes.

Children can abuse other children. This is generally referred to as **child-on-child abuse (including harassment and violence)** and is a safeguarding issue for both the victim and the alleged perpetrator. It can take place inside and outside school, including online, and may involve serious physical harm or threats involving weapons. Child-on-child abuse is preventable and the school will seek to identify risk early and provide evidence-based support to prevent escalation. This can include (but is not limited to) bullying (including

cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - Consensual and non-consensual sharing of nudes and semi-nudes (sexting). This also includes AI-generated sexual images, such as deepfakes and deepnudes, which are increasingly used to target or harm children (KCSIE

- 2026).
- Sharing unwanted explicit content.
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

Upskirting refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

Making or sharing nudes or semi-nudes includes the consensual or non-consensual making, sending, receiving or sharing of nude or semi-nude images, videos or live streams by children. This terminology is used throughout this policy in preference to "sexting" or "youth-produced sexual imagery". It includes images generated or manipulated using artificial intelligence, including deepfakes and deepnudes. All incidents require a safeguarding response, with a proportionate approach that considers age, development, circumstances, coercion, exploitation and vulnerability. Indecent imagery is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals
- AI generated or AI manipulated sexual images, including deepfakes and deepnudes, which must be treated as a safeguarding concern

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and have the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

1.3 LAW & GUIDANCE

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Education Act 2002
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Crime and Policing Act 2026 (including changes to regulated activity and the removal of the supervision exemption for volunteers)
- Data (Use and Access) Act 2025, as applicable to safeguarding information sharing
- School Premises (England) Regulations 2012
- Education (Independent School Standards) Regulations 2014

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- Home Office (2022) 'Domestic Abuse guidance'
- DfE (2023) 'The Prevent Duty Guidance'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) **Keeping Children Safe in Education**
- DfE (current version) **Working Together to Safeguard Children**
- DfE (2025) **Working Together to Improve School Attendance** (statutory from 19 August 2024)
- DfE (2025) **Arranging Alternative Provision and Alternative Provision** (updated 2025)
- DfE (2026) **Plan technology for your school or college** (filtering/monitoring self-assessment; cyber standards)
- DfE (2025) **Relationships, Sex and Health Education Statutory Guidance** (implementation deadline Sept 2025)
- DfE (2025) **Early years foundation stage (EYFS) statutory framework for group and school-based providers** (effective 1 September 2026).

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'

- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Behaviour in schools'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- **DfE (2025) Generative AI: product safety expectations** (safe and effective use of AI in education)

This policy and the procedures contained within, should also be read in conjunction with other school policies related to Safeguarding the Welfare of Children; particularly the Anti-Bullying policy, recognising that child-on-child abuse is a safeguarding issue.

- Administration of Prescribed Medication
- Anti-Bullying
- Asthma
- Attendance
- Behaviour, Rewards and Sanctions
- Data Protection
- Online Safety (ICT Acceptable Use Policy Agreement Appendix A)
- Health and Safety
- ICT Acceptable Use
- Mobile Telephones and Smart Watches
- Mobile Telephones, Cameras and Devices (EYFS)
- Safer Recruitment
- Security, Access Control, Workplace Safety and Lone Working
- Self-Harm
- Special Educational Needs
- Staff Handbook (Staff Code of Conduct)
- Whistle Blowing

2. ROLES & RESPONSIBILITIES

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil with a child-centred approach.
- Contribute to, and maintain a high safeguarding ethos within the setting, with safeguarding pupils at the forefront of practice at all times.
- Ensure ALL pupils have opportunities to communicate and know that they are listened to.
- Contribute to providing a curriculum which will equip pupils with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential.

- Establish effective, supportive, and positive relationships with parents, carers, pupils and other professionals.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be proactive to provide a safe and secure environment in which pupils can learn.
- Be prepared to identify pupils or families who may benefit from early help.
- Be aware of the school's individual procedures that support safeguarding, including all policies, internal reporting procedures, information and engage with training provided.
- Be aware of the role and identity of the DSL and deputy DSLs and seek them for advice if required.
- Undertake safeguarding training, including online safety training, during induction and subsequently on a regular basis. This includes an understanding of the expectations and responsibilities **relating to filtering and monitoring** including reading bulletins, emails and attending briefings. **Staff should undertake Prevent awareness training** as requested.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care (CSC), understanding that anyone can make a referral.
- Understand how to make a referral to CSC and/or the police immediately, if at any point there is a risk of immediate serious harm to a pupil.
- Be aware of and understand the procedure to follow in the event that a pupil confides they are being abused, exploited or neglected, in a timely manner.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, sharing indecent images, and extremist behaviours and other signs that pupils may be at risk of harm.
- Be fully aware of the importance of mental health in relation to safeguarding and that all staff should also be aware that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation.

- Be aware that **a pupil may not feel ready** or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Avoid victim-blaming attitudes, and challenge them in a professional way if they occur.
- Understand the process for reporting **concerns over staff or adult conduct or behaviours**.
- All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm both inside and outside of the school and home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.
- Staff must also understand risks arising from **misinformation, disinformation, conspiracy theories and AI-generated/manipulated content**. Safeguarding duties extend beyond the school gates, including on school trips, after-school activities, online learning and community settings.
- **Be alert to financially-motivated sexual extortion ("sextortion") tactics** targeting children online and follow the school's response (do not pay; preserve evidence; immediate escalation to DSL/police/CEOP as appropriate).

The Examinations Officer has a responsibility to:

- Liaise with the DSL to ensure that external invigilators receive induction training (as detailed in Section 8).
- Ensure that this Safeguarding training is updated annually and any new versions of associated policies are shared.
- Ensure that invigilation staff understand the protocols for 1:1 support/supervision (including summoning assistance, leaving the exam temporarily and escorting candidates to the toilet area)

Teachers, including the Head, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the **'Teachers' Standards'**.
- Report, by law, any disclosures of FGM to the police.

HR has a responsibility to:

- Ensure that all governors receive appropriate safeguarding and child protection training. This should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective. Their training should be regularly updated.

- Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with children, following safer recruitment protocol.
- Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training**.
- Ensure that the **appropriate level of recruitment checks** are completed on Governors
- For EYFS staff and assistants, obtain and verify references before employment; record vetting (including criminal record check reference/date) and ensure new recruits are not left unsupervised until suitability is confirmed, in line with EYFS 2025 safer recruitment.

The Governing Body has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Ensure that all staff, including staff who do not work directly with pupils, read and understand Part One of KCSIE 2026 in full. The school will no longer use the former condensed Annex A as a substitute for Part One.
- Ensure a named Governor takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL and one or more deputy DSLs to provide support, and ensure that they are trained to the same standard as the DSL and that the roles are explicit in their job description(s). Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role.
- Attend Prevent training every two years.
- Support and monitor a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and ethos remains consistently high.
- Ensure systems are in place so that pupils can confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that the voice of the pupil is heard and acted upon.
- Ensure effective and appropriate policies and procedures are in place.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and

learning opportunities, as part of providing a broad and balanced curriculum.

- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children in liaison with HR.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Make sure that at least one person on any recruitment panel has undertaken safer recruitment training in liaison with HR.
- Ensure that **all staff receive relevant safeguarding and child protection training** updates, including online safety and expectations and responsibilities relating to filtering and monitoring systems, eg emails, as required, but at least annually, including a thorough induction.
- Confirm that there are transparent procedures in place to handle allegations against staff, supply staff, volunteers and contractors including when the school premises are let out to a third party.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Ensure that the appropriate level of check is completed on Governors.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensure that the school has appropriate **filtering and monitoring** systems in place and all staff understand their roles and responsibilities around this.
- **Leaders and Governors will ensure an annual, proportionate review of filtering/monitoring effectiveness**, using the DfE Plan technology self-assessment; they will understand how systems work in practice and how concerns are escalated.
- Ensure that the effectiveness of filtering and monitoring systems are regularly reviewed understanding those children that are potentially at greater risk of harm.
- Ensure that all practice and procedures operate with the best interests of the pupil at the centre with a firm pupil centred approach.

- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation and prevent the risk of escalation in the future.
- Ensure that **safeguarding is embedded within the curriculum**.
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child-on-child abuse** and safeguarding children with disabilities and special educational needs.
- Partake and complete the **S175/175 audit tool** on a two-yearly cycle (at least) as directed by the Local Authority.
- Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.
- Ensure there is an effective early help procedure and ensure all staff understand the procedure and their role in it.
- Ensure that Alternative Provision placements are reviewed at least half-termly for safeguarding, suitability and attendance, and that written confirmation of safer recruitment checks has been obtained from providers. Governors must also satisfy themselves that filtering and monitoring arrangements are effective and proportionate.
- Oversee EYFS-specific duties: safer recruitment references before employment, a written EYFS attendance/absence procedure, two emergency contacts for every EYFS child, an EYFS whistleblowing procedure, and evidence that an EYFS DSL is in place whenever the EYFS is operating.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection.
- Provide advice, support and expertise to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions, inter-agency meetings and Child Protection Conferences and/or support other staff to do so.
- Contribute to the assessment of pupils, and/or support other staff to do so.
- Ensure all staff receive appropriate safeguarding training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring. Ensuring this is updated regularly, at least annually.
- Be available during school hours for staff to discuss any safeguarding concerns.

- Ensure robust safeguarding cover arrangements are in place whenever the DSL is unavailable due to illness, leave or other circumstances. This will include an identified deputy/cover arrangement and a confidential shared mailbox or equivalent system so that safeguarding concerns are received, monitored and acted upon without delay.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms (please refer to directory of contacts at the end of this policy).
- Refer cases (see directory of contacts):
 - To CSC where abuse and neglect are suspected, and support staff who make referrals to CSC.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the Disclosure and Barring Service (DBS) where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
 - And to any other appropriate identified agency or partner.
- Act as a point of contact with the multi-agency partners.
- Ensure effective communication and information sharing (when appropriate) between Deputy DSL's/ Pastoral Team/Senior Leadership Team (SLT)/Governors/Head/Staff.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Signpost 'Mental Health Support' where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of pupils, including where families may be facing challenging circumstances.
- Work with relevant staff, taking lead responsibility for promoting educational outcomes for pupils, by understanding the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, knowing the safeguarding and child protection issues that pupils in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
- Ensure that child protection files are kept updated and secure, monitoring the quality

and accuracy of logs.

- Ensure that a pupil's child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer, or within the first five days of the start of a new term for a planned transfer. The file will be transferred separately from the main pupil file using secure transit, confirmation of receipt will be obtained, and a clear structured summary will identify current safeguarding concerns, relevant context and ongoing support needs. Current concerns will be distinguished from historic information. The receiving school will be asked to review safeguarding information promptly and seek clarification where necessary.
- Ensure all stakeholders understand the Child Protection and Safeguarding Policy, **Keeping Children Safe in Education 2025** and internal procedures to report any concerns are transparent and understood by all. Ensure this information is given in induction and at regular intervals/training.
- Work with the Governing Body to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, ensure that parents/carers are aware of school's responsibilities regarding safeguarding and child protection.
- Undergo DSL training, and update this training at least every two years to remain compliant.
- Ensure opportunities for further training and opportunities for upskilling are taken.
- Have due regard to the PACE Code C 2023 in regards to the role of an appropriate adult.
- Encourage a culture of listening to pupils and promoting the voice of the pupil.
- Recognise the importance of information sharing, including within school, with other schools and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Undertake Prevent awareness training.
- Be provided with appropriate support and supervision in order to carry out the role safely and effectively.
- Have due regard to **Appendix C of Keeping Children Safe in Education 2025 – 'The Role of the Designated Safeguarding Lead'**.
- **Review and evidence the effectiveness of filtering and monitoring systems regularly**, ensuring arrangements are proportionate. Use the DfE's Plan Technology tool and

cyber security standards to support this review. Signpost young people to resources such as Shore Space (Lucy Faithfull Foundation) where appropriate. Maintain oversight of children with a social worker and those in kinship care, in line with the extended responsibilities of Virtual School Heads.

- Ensure that during EYFS operating hours an EYFS Designated Safeguarding Lead (DSL) is in place and available, with training and responsibilities aligned to the EYFS statutory framework. For KGJS EYFS, the Designated Safeguarding Lead is Mrs Sharon Anyon (Pre-School Manager).
- Ensure EYFS safeguarding and welfare requirements (EYFS Section 3) are implemented, including safer recruitment, staff training, absence follow-up and supervision/ratios.

Kirkham Grammar School recognises that Deputy DSL's must be trained to same standard as the DSL.

3. PROCEDURES FOR RECORDING & REPORTING CONCERNS

If a pupil wishes to make a disclosure/report

Do:

- Stay calm and reassuring.
- Listen to and take what the pupil says seriously and uncritically, at the pupil's pace.
- Tell the pupil that they are right to tell someone.
- Arrange a place and a time where you can talk privately and uninterrupted as soon as possible.
- Explain that you will need to involve other people and why.
- Be supportive.
- Give realistic encouragement. You may prompt where necessary with where, what, when, etc.
- Allow the pupil to speak, and write up at the end.
- Let the pupil know that they are not to blame.
- Make a report on CPOMS of what is said by the pupil – unprompted and using the pupil's own words wherever possible. State who was present, time, date and place. If a written record is made this must be in ink and signed by the member of staff who took the disclosure. This must be copied in to CPOMS or attached as a document at the earliest opportunity.
- Send the report to the DSL immediately. If not possible, a verbal report should be given to the DSL to enable procedures to be followed in a timely manner.
- Talk to the DSL about your feelings and seek support for yourself.

KCSIE emphasises that ANYONE can contact children's social care if they are concerned about a pupil and it is in the best interests of the pupil. Children's Social Care Emergency Duty Team 0300 1236720. (Out of hours 0300 1236722)

Do not:

- Promise confidentiality as you may share information with the DSL or CSC.

- Make promises or reassurances you cannot keep.
- Assume that someone else will take the necessary action.
- Investigate further, press for details or ask leading questions which may invalidate court proceedings.
- Speculate, accuse anybody or confront another person.
- Ask the pupil to repeat the details unnecessarily.
- React emotionally or offer opinions.
- Interrupt or stop a pupil during a disclosure or offer opinions about what is said.
- Underestimate your role as a trusted adult.
- Forget to record what is said.

Pupils with communication difficulties

While extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, suspicions should be reported in exactly the same manner as for other pupils. Opinion and interpretation will be crucial (be prepared to be asked about the basis of it and to possibly have its validity questioned if the matter goes to court).

EYFS (Nursery/Pre-School) – additional considerations:

Practitioners must be alert to non-verbal and developmental indicators of harm (eg changes in feeding, toileting, sleep, behaviour or injuries) and follow the same recording and referral steps set out above. Providers must notify the appropriate regulator without delay where serious harm or abuse is alleged on the EYFS premises, in line with the EYFS statutory framework.

Recording

CPOMS is used for recording concerns. **User Guide/Video Guide for the use of CPOMS is held on the Foundation Staff Drive and on the Safeguarding Classroom.**

Records should:

- State who was present, time, date and place.
- Be recorded on CPOMS at the earliest opportunity. Any written statements must be scanned and uploaded to CPOMS using a secure scanner.
- Alert the DSL and DDSL on CPOMS.
- Use the pupil's words wherever possible.
- All concerns should be written in an objective and factual way avoiding subjective commentary or speculation. Use full First Names of all pupils involved and use the pupils' words where possible.

Notifying parents/carers

The school will normally seek to discuss any concerns about a pupil with their parents/carers. This must be handled sensitively and the DSL will make contact with the parent/carer in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents/carers could increase the risk to

the pupil or exacerbate the problem, advice will first be sought from MASH 01772 531643 or LCC School Safeguarding Advice 01772 531196.

4. MULTI-AGENCY WORKING

Kirkham Grammar School contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements. Further details on www.safeguardingpartnership.org.uk

The school will be fully engaged, involved, and share information with local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will work with the Children & Family Wellbeing Team, CSC, the Police, health services and other relevant partners and agencies for the benefit of families and pupils ensuring contribution to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSC from the host Local Authority (LA) and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

Kirkham Grammar School also recognises the particular importance of inter-agency working in identifying and preventing CSE and CCE.

INFORMATION SHARING

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs, identify early help and respond to safeguarding risks. Staff should share information as early as possible where this will help identify, assess or respond to concerns.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

When deciding what safeguarding information to share, staff and the DSL will consider whether the information is relevant to the current safeguarding risk, what is necessary for the receiving setting to know and whether the information is clearly presented and appropriately contextualised. Professional judgement will be used to ensure information is focused and proportionate, without omitting information that may be relevant to understanding or managing safeguarding risk. Information may be shared without consent where there is a lawful safeguarding basis and obtaining consent is not possible,

cannot reasonably be expected, or would place a child at risk.

EARLY HELP

Early help means providing support as soon as the need emerges, at any point in a child's life.

Kirkham Grammar School recognises that any staff professional can provide early help. Any pupil or family may benefit from early help, but staff must consult the Pastoral Hub team for potential wellbeing needs to be paid to children with child protection files and potentially vulnerable children who:

- Are disabled, have certain health conditions, or have specific additional needs
- Have Special Educational Needs and Disabilities (SEND)
- Are EAL
- Have mental health needs
- Are ethnic or religious minorities
- Are looked after children
- Have addictive personalities (eg vaping & gambling)
- Are displaying significant stress or anxiety
- Are self-harming
- Show signs of eating disorders
- Are involved in bullying
- LGBTQ+
- Are bereaved
- Have parents in dispute with one another
- Are young carers
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Are frequently missing or going missing from education, home or care
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Are at risk of being radicalised
- Has a parent or carer in custody, or is affected by parental offending
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- Are misusing drugs or alcohol
- Have returned home to their family from care
- Are at risk of Honour Based Abuse (HBA), such as Female Genital Mutilation (FGM) or forced marriage
- Are privately fostered
- Are persistently absent from education, including persistent absences for part of the school day
- Are displaying harmful sexual behaviours which may pose a risk to other children and themselves
- Show any other early signs of abuse, neglect or any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children
- Has experienced multiple suspensions, is at risk of being permanently excluded from school

The DSL or DDSL will take the lead where early help is appropriate and consent has been gained. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required to help provide the right, effective support at the right time.

Early Help Assessment - information for professionals - Lancashire County Council

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review assessing the impact of the support.

The school will therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or pupil may benefit from Early Help and can follow school procedures to share this with the DSL
- DSLs or surgery managers will undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required
- DSLs will signpost and refer to appropriate support agencies
- DSLs will lead on TAF meetings where it is appropriate for them to do so
- DSLs will follow the local safeguarding processes and refer to Children's Social Care where Early Help has not been successful in reducing risk and meeting unmet needs using the Levels of Need contained within Working Well with Children and Families in Lancashire guidance

5. TYPES OF ABUSE

5.1 ABUSE, NEGLECT AND EXPLOITATION

Abuse is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, eg via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

Physical abuse is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child. Staff are made aware of Female Genital Mutilation, a form of Physical abuse.

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

cyberbullying, causing the child to frequently 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, but it may also occur alone.

Sexual abuse is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

Neglect is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff must:

- Be aware of the indicators of abuse and neglect, remain vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms.)
- Be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.
- Understand that pupils who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported. Risk Assessments should be undertaken where a pupil's behaviour poses a risk to others, themselves or the environment.
- Understand that there are specific and emerging ways in which pupils can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL.

Specific issues include (but are not limited to) those listed in points 6.1 to 6.14 of this policy.

5.2 DOMESTIC ABUSE

In line with the Domestic Abuse Act 2021, **domestic abuse** is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. **Abusive behaviour** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological

or emotional abuse, or another form of abuse.

The school will recognise the serious, long lasting emotional impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff must be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Kirkham Grammar School participates in Operation Encompass is now delivered as a statutory information-sharing duty on police forces to notify education settings following domestic abuse incidents. The lead person for Operation Encompass is the DSL/DDSL www.operationencompass.org

5.3 CHILD-ON-CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

Child-on-child abuse is defined as abuse between children under 18 years of age.

Kirkham Grammar School has a **zero-tolerance approach to abuse**, including child-on-child abuse.

Kirkham Grammar School will refer to specific guidance in Keeping Children Safe in Education Part five: Child-on-Child Sexual Violence and Sexual Harassment and Lancashire Procedures. [5.31 Peer Abuse \(proceduresonline.com\)](http://proceduresonline.com)

All staff must be aware that (child-on-child) abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff must be aware of the indicators of (child-on-child) abuse, how to identify it, and how to respond to reports. All staff must also recognise that even if no cases have been reported, this is not an indicator that (child-on-child) abuse is not occurring. All staff must speak to the DSL when they have any concerns about (child-on-child) abuse.

All staff must understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Staff must not dismiss sexual harassment, harmful sexual behaviour, misogyny or other abusive conduct as "just banter", "just having a laugh", "part of growing up" or "boys being boys". Such attitudes can normalise abuse, contribute to misogyny/misandry and create an unsafe environment in which pupils do not report concerns.

The school recognises the progressive continuum from harmful sexual behaviour to sexual harassment and sexual violence and will seek early identification and intervention, including appropriate support for pupils who display harmful or abusive behaviour.

Child-on-child abuse may include serious physical assault or harm, or threats of harm involving a weapon; harmful sexual behaviour; sexual violence and sexual harassment, including misogyny/misandry; and the making or sharing of nudes or semi-nudes, including AI-generated images.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation and hazing-type violence and rituals, which can 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.

All staff must be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a pupil may be at risk from it.

All staff are made aware of the heightened vulnerability of pupils with SEND both online and offline, who evidence suggests are more likely to be abused than their peers. Staff must not assume that possible indicators of abuse relate to the pupil's SEND and must always explore indicators further.

All staff are made aware of the heightened vulnerability of LGBTQ+ pupils both online and offline, whom evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between pupils of the opposite sex.

Pupils are made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils are also reassured that they will be taken seriously, be supported, and kept safe. This process will be continually reviewed by the DSL/SLT.

The school's procedures for managing allegations of child-on-child abuse are outlined in the school Behaviour, Rewards & Sanctions Policy. Staff must follow these procedures, as well as the procedures outlined in the school's Anti-Bullying Policy where relevant.

Kirkham Grammar School and DSL will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the pupils involved
- the development stages of the pupils involved
- any power imbalance between the pupils
- is the incident a one-off or a sustained pattern of abuse

- are there ongoing risks to the victim, other pupils or school staff
- contextual safeguarding issues

For some forms of child-on-child abuse it is more likely that girls will be victims and boys will be perpetrators; however, all child-on-child abuse is unacceptable and will be taken seriously. The school will not make assumptions based on sex, gender or perceived identity when assessing an individual concern.

The school will ensure that child-on-child abuse procedures clearly set out how allegations are recorded, investigated and dealt with, and how victims, alleged perpetrators and other affected pupils are supported. Reporting systems will be well promoted, easily understood and accessible, and pupils will know that concerns will be taken seriously.

Following a report of sexual violence, the Designated Safeguarding Lead (or deputy) will make an immediate risk and needs assessment, considering:

- the victim
- the alleged perpetrator
- all other pupils (and if appropriate adult pupils and staff)
- Risk and needs assessments will be recorded and kept under review in response to changing circumstances and at least termly, or more frequently where risk requires
- **Refer to Guidance in Keeping Children Safe in Education Sept 2025, Part 5**
(part 5: Child on child sexual violence and sexual harassment)

6. SAFEGUARDING CONCERNS

6.1 CHILDREN ABSENT FROM SCHOOL

Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. **The school follows the statutory guidance Working together to improve school attendance (in force from 19 August 2024).** Staff & the attendance officer will monitor pupils that are absent from school, particularly on repeat occasions and without parental explanation and report them to the DSL following normal safeguarding procedures, and in accordance with the Attendance Policy. Staff register lesson by lesson and report any unexplained absence to the Attendance Officer, reception and pastoral staff. The school will inform LCC of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Pupils who leave KGS and are off roll with no particular place to go are reported to CME by the Admissions Manager.

The school will hold more than one emergency contact number for pupils.

EYFS (Nursery/Pre-School) – child absence:

The EYFS requires immediate follow-up of unnotified absences, contacting parents/carers and at least two emergency contacts, assessing patterns/trends and vulnerability, and referring concerns to Children's Social Care and/or requesting a police

welfare check where appropriate. A written EYFS Attendance/Absence procedure will be shared with parents/carers.

6.2 CHILDREN ATTENDING AN APPROVED EDUCATIONAL ACTIVITY

An approved educational activity is where a pupil is attending another school at which they are registered or taking part in off-site activity such as field trips, educational visits, work experience or unregistered alternative provision.

Pupils can only be recorded as attending an off-site activity if it is approved by the school, of an educational nature and supervised by someone authorised by the school. Such activities include:

- Dual registered at another school
- Participating in a supervised sporting activity
- Educational visit or trip
- Work experience

6.3 CHILD CRIMINAL EXPLOITATION (CCE)

Child criminal exploitation is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE may include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of **any gender** are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Appearing with unexplained gifts, money or new possessions.

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks/gangs, groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered in addition to normal safeguarding procedures.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home
- Having been the victim or perpetrator of serious violence, eg knife crime
- Receiving requests for drugs via a phone line, moving drugs, collecting money
- Being found in accommodation to which they have no connection
- Owing a 'debt bond' to their exploiters
- Having their bank account used to facilitate drug dealing

6.4 CHILD SEXUAL EXPLOITATION (CSE)

Child sexual exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence, this could be online or through technology.

Kirkham Grammar School will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, eg through others sharing videos or images of them on social media. The school recognises that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school also recognises that pupils may not realise they are being exploited and they believe they are in a genuine romantic relationship.

School staff must be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff must discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

6.5 CONCEALED AND DENIED PREGNANCY

A concealed pregnancy is when a woman knows she is pregnant but does not tell anyone; or when she tells a professional but conceals the fact that she is not accessing antenatal care; or when she tells another person or persons and together they conceal the fact from all agencies. A denied pregnancy is when an expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or be misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant. There may be a number of reasons why a pregnancy is concealed or denied, including, but not limited to; fear of stigma or shame, in cases of rape, sexual or domestic abuse, forced or sham marriage, fear of a child being removed or asylum seekers and illegal immigrants who may be reluctant to come to the attention of authorities. In some cases the woman may be truly unaware that she is pregnant. In some cases an expectant mother may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements.

[Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership \(proceduresonline.com\)](http://proceduresonline.com)

Further training is available for staff regarding concealed or denied pregnancy

[Concealed-and-Denied-Pregnancy-2020-7MB.pdf \(lancashiresafeguarding.org.uk\)](http://lancashiresafeguarding.org.uk)

6.6 MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff must be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff must also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism. (From The Modern Slavery Act 2015, Section 52). The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking'.

6.7 FGM

FGM is defined as all procedures involving the 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.

All staff must be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been

a victim of FGM, they are required to share this information with CSC and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSC as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff must be aware of the indicators that pupils may be at risk of FGM. While some individual indicators may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff must be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society
- The pupil coming from a community known to adopt FGM
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE
- Travel abroad or a long holiday with relatives to a country known to practise FGM.

FGM is included in the definition of **honour-based abuse (HBA)** which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff must be alert to the signs of HBA, including concerns that a pupil is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

6.8 FORCED MARRIAGE

Forced marriage is defined as a marriage that is 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 the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, eg due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage must speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced

Marriage Unit. The Forced Marriage Unit may be contacted for advice at fmu@fco.gov.uk.

6.9 EXTREMISM & RADICALISATION

For the purposes of this policy, "extremism" is defined by the government as the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in points 1 or 2.

Extremism also includes calling for the death of members of the armed forces. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff must be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff must use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents/carers, unless the school has reason to believe that the pupil would be placed at risk as a result.

The DSL and the Prevent Lead will undertake the Lancashire Prevent partnership in depth training, available via the Lancashire Prevent partnership website www.lancashirepreventpartnership.org.uk. Staff will complete regular online training sessions to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation. The Online Safety Policy will support the safeguarding of children online by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering and monitoring software and supervision is in place. Systems are regularly tested using technology.

DSLs understand when it is appropriate to make a referral to the Lancashire Prevent Team and are aware of how to do so.

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **the Prevent Duty**, forming part of the school's wider safeguarding obligations.

Kirkham Grammar School will ensure that ALL Staff, Governors and volunteers are informed and have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty' and follow guidance from www.lancashirepreventpartnership.org.uk

Prevent referral process – see Appendix 1

Prevent Lead	Mrs A V Wadeson
Prevent Governor Lead	Mr K Berry
Prevent Curriculum Lead	Mrs H Holmes

6.10 PRIVATE FOSTERING

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, (with someone who is not a close relative), this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

6.11 PUPILS WITH A PARENT/CARER IN CUSTODY

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

6.12 SERIOUS VIOLENCE

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime must immediately report their concerns to the DSL.

6.13 ONLINE SAFETY AND PERSONAL ELECTRONIC DEVICES

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

To address this, our school will:

- Review the effectiveness of filtering and monitoring systems at least once every academic year. The review will be carried out by the SLT member responsible for filtering and monitoring, with support from the DSL and IT support. It will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of the checks will be retained. The school will use the DfE 'Plan technology for your school' service and relevant filtering and monitoring standards/cyber security standards to support the review. Staff will know how to escalate concerns. Staff vigilance remains essential; technology cannot replace professional judgement. Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- When school become aware of an online safety issue that has occurred outside of school, it is managed in accordance with the Online Safety Policy and the Behaviour, Rewards and Sanctions Policy.
- Staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff do not rely solely on IT systems as this may leave some children vulnerable.
- Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.
- The school will be mobile-phone-free by default in accordance with DfE statutory guidance. Pupils will not normally have access to mobile phones during the school day, including lessons, transitions, break and lunchtime, except where an authorised exception applies under the school Mobile Telephone & Smart Watches Policy.

The 4 key categories of risk

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

- **Content** – exposure to illegal, inappropriate or harmful material such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that stimulate such interaction, including peer-to-peer pressure and adults posing as children or young adults with the intention to groom or exploit pupils for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, including making, sending and receiving explicit images, including those generated using AI, and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Generative AI and emerging technologies: The school will follow DfE's **Generative AI product safety expectations** when assessing or using AI-enabled tools, ensuring filtering/monitoring and safeguarding expectations apply equally to AI chat or image generation features.

EYFS (Nursery/Pre-School) – imaging and devices:

In EYFS settings, personal devices must not be used to take or store images; the policy must set out exactly when and how setting devices are used for images/videos and how these are stored/retained, in line with the EYFS statutory framework.

Personal electronic devices:

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff Code of Conduct, Mobile Telephone & Smart Watches Policy and Mobile Phones, Cameras and Devices Policy (EYFS).

Where photographs and videos will involve pupils who are Child Looked After (CLA), adopted pupils, or pupils for whom there are security concerns, the Head will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff must report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures. Kirkham Grammar School is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

School will therefore ensure that:

- parental consent is obtained to take and use photographs and/or videos of pupils, for use in school, to market the school or to share on social media/internet.
- staff, visitors, volunteers and pupils do not use their own mobile phones or devices to take or record any images of pupils.

6.14 UPSKIRTING

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, eg a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting must be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

6.15 MAKING OR SHARING NUDES AND SEMI-NUDES

The school uses the term "making or sharing nudes or semi-nudes" rather than "sexting" or youth-produced sexual imagery". This includes the making, sending, receiving or sharing of nude or semi-nude images, videos or live streams by children, including images generated or manipulated using AI. Incidents may be consensual or non-consensual and all require a safeguarding response, with a proportionate assessment of age, development, context, coercion, exploitation and vulnerability. UKCIS – sharing nudes and semi-nudes: advice for education settings (UKCIS, 2020).

UKCIS – Sharing nudes and semi-nudes: advice for education settings (UKCIS, 2020)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

The school will ensure that staff understand that all incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response, whether consensual or non-consensual.

Staff will receive appropriate training regarding child sexual development so that they understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sexting.

Staff must be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incident involving the making or sharing of nudes or semi-nudes, they must refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member must:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and

- reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

Where it is necessary to view the imagery, eg if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- never copy, print, share, store or save them; this is illegal.
- Discuss this decision with the Head or member of the SLT.
- make sure viewing is undertaken by the DSL (or equivalent) or a member of the SLT.
- make sure viewing takes place with another member of staff present in the room, ideally a member of the SLT.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Head's or a member of the SLT's office.
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called.

The above summarised points are explained in further detail with important supporting guidance in the UKCIS guidance – Sharing nudes and semi-nudes: advice for education settings.

6.16 SEXTORTION

There has been a large increase in reports of children and young people being forced into paying money or meeting another financial demand after an offender has threatened to release nudes or semi-nudes of them. This type of online blackmail is often referred to as 'sextortion' and is a form of child sexual abuse. Kirkham Grammar School will ensure that staff are aware that this can happen and the school will follow guidance issued by the National Crime Agency.

6.17 BOARDING AND RESIDENTIAL ACCOMMODATION

CHILDREN WHO ARE QUESTIONING THEIR GENDER

Where a child or parent/carer raises a request relating to social transition, the school will respond sensitively, consider the child's welfare and best interests and those of other pupils, involve parents/carers as a matter of priority, and involve the DSL, SENCO and other appropriate professionals where relevant. The school will not initiate social transition arrangements.

Decision-making will be documented and kept under review. The school will comply with its safeguarding, Equality Act 2010 and Human Rights Act 1998 duties. The school will consider whether any policy places a gender-questioning child at a disadvantage and, where relevant, whether a policy is a proportionate means of achieving a legitimate aim.

In accordance with KCSIE 2026, the school will not allow pupils to access toilets, changing rooms or boarding/residential accommodation designated for the opposite sex. Where a gender-questioning pupil does not wish to use facilities designated for their biological sex, the school will consider safe alternative arrangements that do not compromise the safety, comfort, privacy or dignity of the pupil or other pupils. Where the school operates single-sex sport for safeguarding or safety reasons, pupils will not be permitted to participate in sport designated for the opposite sex.

Kirkham Grammar School recognises that boarding and residential accommodation creates additional safeguarding considerations. The school will remain alert to the additional vulnerabilities of pupils with SEND, inappropriate pupil relationships, child-on-child abuse, peer dynamics, overnight supervision, and safeguarding concerns arising outside the normal school day. The DSL will work closely with the Head of Boarding and relevant local authorities where appropriate.

The school will comply with the National Minimum Standards for Boarding Schools and other applicable residential safeguarding requirements. Sleeping arrangements, boarding accommodation, trips and overnight stays will be risk assessed and must protect pupils' safety, comfort, privacy and dignity.

A child must not share overnight accommodation with a child of the opposite biological sex. A request to support social transition must not include access to boarding or residential accommodation designated for the opposite sex. Where a pupil does not wish to share a room with another pupil of the same biological sex, the school will consider safe alternative arrangements that do not compromise the safety, comfort, privacy or dignity of any pupil.

6.18 SCHOOL PREMISES, TOILETS, CHANGING ROOMS AND SPORT

The school will comply with the safeguarding requirements relating to school premises set out in KCSIE 2026, the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014. Children will not be permitted to use toilets designated for the opposite biological sex. Separate toilets will be provided for boys and girls aged 8 and over, except where individual toilets are

contained in a room that can be locked from the inside and are intended for use by one pupil at a time. Any mixed-sex toilets provided in addition to single-sex toilets will be subject to safeguarding risk assessment and, where provided, will be individual lockable facilities opening directly onto public areas.

Children aged 11 or over at the start of the school year will not be permitted to undress in front of a child of the opposite biological sex. Changing rooms and showers will be provided and managed with regard to pupils' age, numbers, sex and safeguarding needs. Where a pupil does not wish to use the changing facility designated for their biological sex, the school will consider an appropriate alternative that does not compromise the safety, comfort, privacy or dignity of any pupil.

Where the school operates single-sex sport for safety reasons, there will be no exceptions to the arrangements. Where a child requests support with participation in sport and there are no safeguarding or safety concerns, the school will consider the request in accordance with its gender-questioning policy and its Equality Act and Human Rights Act duties.

7. CONTEXT OF SAFEGUARDING INCIDENTS

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSL(s), must always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSC/CFW or external agencies.

PUPILS POTENTIALLY AT GREATER RISK OF HARM

Kirkham Grammar School recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

CO-CURRICULAR ACTIVITIES AND CLUBS

Where Kirkham Grammar School provides activities (outside of regular school hours) under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another organisation, this may not be the case; therefore, the school will seek assurance that the organisation concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

Staff and volunteers running activities and clubs are made aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.

Where the school hires or rents out facilities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will ensure safeguarding requirements are included in any transfer of control agreement, ie a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement. This is in line with the guidance on Keeping children safe in out-of-school settings

ALTERNATIVE PROVISION

- The school retains responsibility for a pupil's welfare while they are placed in Alternative Provision.

The school will:

- Obtain written confirmation from providers that safer recruitment checks have been completed on their staff and volunteers.
- Ensure the physical location/address of the provision is known and accessible.
- **Review each placement at least half-termly** to assure safety, suitability and attendance.
- Withdraw placements where safeguarding concerns are not adequately addressed.

Contextual Safeguarding (Children with Social Workers / Kinship Care)

The role of the Virtual School Head (VSH) now extends beyond looked-after children to include children in kinship care and those with a social worker. Schools must work in partnership with the VSH to promote the educational outcomes of these pupils.

YOUNG CARERS

The school recognises that young carers may have additional safeguarding, attendance, wellbeing and educational needs. Staff will be alert to signs that caring responsibilities are affecting a pupil and will refer concerns to the DSL so that appropriate support and, where necessary, family help can be considered.

CHILDREN WITH MEDICAL CONDITIONS

The school recognises children with medical conditions may face additional safeguarding and welfare risks, including where a condition affects attendance, participation, communication or the child's ability to seek help. Safeguarding considerations will be integrated with individual healthcare plans and other relevant support arrangements, with information shared appropriately on a need-to-know basis.

8. TRAINING & INDUCTION

Kirkham Grammar School recognises the importance of ongoing staff training and development to keep staff aware of emerging issues and keeping the ethos of safeguarding high. All staff have a role to play in safeguarding pupils and the school

endeavours to ensure all staff are well informed and know what to do if they have any concerns. Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-Child Abuse (including harassment and violence) and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE 2026), read in full by all staff.
- The Behaviour, Rewards & Sanctions Policy.
- The E-Safety Policy.
- The Attendance Policy, including the safeguarding response to pupils who have unexplained absences or go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and Deputy DSL(s).
- How to record concerns on CPOMS
 - Misinformation, disinformation and conspiracy theories
 - AI-generated/manipulated content (deepfakes, deepnudes)
 - Low-level concerns, including staff online behaviour
 - Shore Space (Lucy Faithfull Foundation) as a support resource
 - Filtering and monitoring oversight responsibilities
 - Operation Encompass (statutory duty): Key Adult awareness

Following induction, Kirkham Grammar School recognises the need to ensure continual, effective training to staff and other stakeholders.

The school will ensure that:

- ALL staff and volunteers will receive Safeguarding Training (at least) annually.
- The DSLs provide ALL staff, volunteers and governors with regular safeguarding updates.
- ALL staff, volunteers and governors read and show an understanding of any updates that are provided.
- DSLs attend DSL training every 2 years and update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis.
- The DSL along with Governors and all staff undertake Prevent awareness training (at least) every two years
- At least one member of staff and one governor attends Safer Recruitment Training. This will be renewed at least every 5 years.
- ALL staff, volunteers and governors undertake any additional specialised training on matters such as Child Sexual Exploitation, Prevent, Child-on-Child abuse, Online Safety, FGM, etc as is deemed necessary by the SLT/DSL and which are particularly relevant to the context of Kirkham Grammar School.
- Any staff member discusses specific training requirements or gaps in knowledge or understanding with the DSLs.
- Staff receive opportunities to contribute towards and inform the safeguarding

arrangements in the school.

- Detailed records are held of staff safeguarding training and inductions in order to ensure that no training becomes out of date.
- All staff, including staff who do not work directly with pupils, will read and confirm that they have understood Part One of KCSIE 2026 in full. The former condensed Annex A is no longer used as an alternative to Part One.

8.1 STAFF TRAINING RECORDS

TRAINING FOR DESIGNATED STAFF IN SCHOOL

Name of staff member / Governor	Date when last attended child protection training	Provided by whom, eg LCC, Governor Services
Mr N Taylor Mrs H Shuttleworth Mrs K Aldeen Mr S Lewis Mrs J Dinsley	March 2023 March 2023 March 2023 March 2023	LCC LCC LCC LCC Designated Safeguarding Leads should refresh their training every two years

WHOLE-SCHOOL CHILD PROTECTION TRAINING

Who attended, eg all teaching and welfare / support staff, Governors, volunteers	(to be updated on a 3-yearly basis)	Training delivered
All Staff	02/09/2024 11/2023 09/2023 09/2022-06/2023 09/2022 10/2022-11/2022 09/2021(or upon appointment) 01/2020 09/2019	Prevent Training (led by Prevent Delivery Officer) Filtering and monitoring Vicky Wallace - School Safeguarding Officer, LCC- KCSIE 2023 updates & key safeguarding refreshers. Online regular safeguarding updates NW led Safeguarding updates All staff completing Online Safeguard Training and Online Prevent Training Vicky Wallace - School Safeguarding Officer, LCC KCSIE 2021 / Safeguarding including Child-on-Child Online Safeguarding Children & Prevent - The Key P Threlfall - Safeguarding and Training Consultancy KCSIE 2020 / Safeguarding Nicki Walter/Helen Shuttleworth KCSIE 2019 updates and safer working practice

New entries for 2026-27 (to be recorded on delivery):

All Staff Autumn Inset 2025

KCSIE 2026 Updates; attendance (statutory); mis/disinformation; sextortion; early help; filtering/monitoring responsibilities

Key Adults (Operation Encompass) Autumn 2025

Operation Encompass CPD (statutory duty awareness and response)

DSL/DDSL Team Autumn 2025

KCSIE 2026 deep-dive; Alternative Provision 2025; attendance statutory

Governors (including safeguarding Governor, Mr K Berry) Autumn 2025

Safeguarding oversight; annual filtering/monitoring review; cyber governance

All Staff Spring 2026

Generative AI in education - DfE product safety expectations; safe classroom use; escalation & DPIA prompts

Prevent (biennial cycle) Spring/Summer 2026

Prevent awareness refresh (local risk picture and referral pathways)

KGJS/EYFS Staff ongoing 2025-26

EYFS safeguarding; mobile devices/cameras; safer working practice

STAFF AND GOVERNORS WHO HAVE BEEN TRAINED IN SAFER RECRUITMENT

Name of staff member / Governor	Date attended/undertaken training	Provided by whom
Mrs K Aldeen	October 2022	The Key Safeguarding Training Centre
Mr A Berry	Sept 2023	The Key Safeguarding Training Centre
Mr S Lewis	March 2022	The Key Safeguarding Training Centre
Mrs A Longley	November 2023	The Key Safeguarding Training Centre
Mrs H Shuttleworth	July 2015	NSPCC

STAFF WHO HAVE BEEN TRAINED IN THE 'PREVENT' DUTY

Name of staff member /Governor	Date attended/undertaken training	Provided by whom
Mrs A Wadeson	November 2023	LCC

EYFS (Nursery/Pre-School): All EYFS practitioners complete safeguarding training at least every 2 years in line with EYFS Annex C; the policy will state how EYFS training is delivered and how practitioners are supported to embed it.

Paediatric First Aid (PFA): at least one PFA-qualified practitioner is available at all times; early-years students/trainees must have PFA to be included in ratios.

EYFS whistleblowing: a written procedure is in place and all EYFS staff know how to use it.

8.2 MANAGING REFERRALS

All staff members, in particular the DSL/DDSLs, must be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and

support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer must contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents/carers will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents/carers to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

8.3 CONCERNS ABOUT STAFF AND SAFEGUARDING PRACTICES

If a staff member has concerns about another member of staff (including supply staff, organisations who use/hire the school premises and volunteers), it must be raised with the Head. If the concern is with regards to the Head, it must be referred to the Chair of Governors.

Any concerns regarding the safeguarding practices at the school must be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

8.4 ALLEGATIONS OF ABUSE AGAINST STAFF

There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children.

All allegations against staff, supply staff, volunteers, contractors and any person who may use or hire the school premises, will be managed in line with the school's Whistleblowing Policy - a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns". Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they 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.

All staff at Kirkham Grammar School are made aware of these procedures and of the following expectations and protocol:

- To refer allegations or concerns around staff (including supply staff) conduct to the Head.
- To refer allegations or concerns around the Head to the Chair of Governors.
- The Head and/or Chair of Governors will discuss the allegation with the Local Authority Designated Officer (LADO).
- CSAP procedures for dealing with allegations against staff will be followed http://panlancashirescb.proceduresonline.com/chapters/p_allegations.html
- To remember that the welfare of the child is paramount and that they have a duty to inform the Head if any adult's conduct gives cause for concern.
- All low-level concerns surrounding staff or any adult in a position of trust should be reported to the Head.
- To be aware of the school's Whistle Blowing Policy which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.
- To be familiar with the *Guidance for Safer Working Practice* and staff Code of Conduct and Handbook and therefore aware of the professional expectations regarding their own behaviour and conduct.
- Further information, LADO information and flowchart of how allegations are managed:



2021 LADO Flyer
May 2021.doc



Threshold matrix
LADO August 2022

Kirkham Grammar School recognises that children may make disclosures against someone who is in a position of trust not in the school setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, the school recognises a requirement to refer to the LADO and share information.

8.5 LOW LEVEL CONCERNS

The school will ensure that all staff are aware of how to recognise and report **low-level concerns** around staff behaviour or conduct.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with pupils
- having favourites
- taking photographs of pupils on their mobile phone, contrary to school policy
- engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Kirkham Grammar School will promote an open and transparent culture in which all concerns about any adult working in or on behalf of the school (including supply teachers, volunteers, contractors or those that have hired/let the premises) are dealt with promptly and appropriately. The school will strive to embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The school will ensure that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low-level concerns and will be empowered to do so. Staff must report their concerns to the Head. If concerns are surrounding the Head, this must be referred to the Chair of Governors. Guidance from Keeping Children Safe in Education 2026, will be followed in relation to the recording, storage, review and management of such concerns.

If in doubt whether the concern is a low-level concern, the Head will consult with the LADO for guidance.

The governing body will ensure low-level concern procedures and staff behaviour expectations are clearly addressed within the Staff Code of Conduct and the Whistleblowing Policy, and procedures are implemented effectively, ensuring that

appropriate action is taken in a timely manner to safeguard pupils and facilitate a whole school approach to dealing with any concerns.

9. SAFER RECRUITMENT

The Safer Recruitment Policy should be read in conjunction with this policy. Kirkham Grammar School is committed to keeping pupils safe by ensuring that adults who work or volunteer in school are safe to do so. We therefore ensure that KCSIE 2026, Part Three and the current statutory guidance on regulated activity, including the removal of the supervision exemption for volunteers from 1 September 2026.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for teaching, training, instructing or the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Engage in regulated activity as defined by the current statutory guidance, including activity undertaken frequently, on more than 3 days in a 30-day period, or overnight where the relevant conditions apply.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The Governing Body will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

Kirkham Grammar School will ensure that:

- The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors according to the nature of their role. From 1 September 2026, volunteers who undertake regulated activity with children must have an enhanced DBS check with children's barred list information. This includes volunteers undertaking regulated activity on overnight school trips. Occasional volunteers, such as parents helping on a one-day school trip, are not automatically in regulated activity solely because they are supervised.
- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear.
- There are sufficient staff/governors who have undertaken appropriate Safer Recruitment training in the last 5 years to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel.
- Covering (umbrella) letters will be obtained from agencies and other employers that provide staff to work in school to confirm that appropriate checks have been undertaken.
- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer.

- Inform short listed candidates that an online search as part of our due diligence may be conducted as part of the recruitment process. This may help identify any incidents or issues that have happened, and are publicly available online.
- A transfer of control agreement will be used where other organisations use school premises and are not operating under school's safeguarding policies and procedures
- Adults who are involved in the management or provision of child care of children in Early Years, or in out of school provision for children up to 8 years old, will make a declaration that they are not disqualified under the Child Care Act 2006 (it is good practice to ensure that this declaration is renewed annually for those staff working in a relevant setting). This form will be retained and stored securely.
- Advice regarding aspects of Safer Recruitment is sought from Weightmans as/when required.

Referral to the DBS

There is a legal requirement for schools to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

EYFS (Nursery/Pre-School) – safer recruitment:

For EYFS roles (including assistants), providers must obtain verified references before employment (not open “to whom it may concern” letters), record vetting and qualification checks (including criminal record check reference number/date), and ensure no new recruit is left unsupervised or in ratios until suitability is confirmed, in line with EYFS 2025.

9.1 SINGLE CENTRAL RECORD (SCR)

The school keeps a SCR which records all staff, including agency and third-party supply staff (for longer placements), and teacher trainees on salaried routes, who work at the school.

All members of the Governing Body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check or prohibition from profession check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check is completed for those in management positions (SLT, HOD's & Governors)

- Any other information deemed relevant

If any checks have been conducted for volunteers or Governors, these may also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded. The details of an individual will be removed from the SCR once they no longer work or volunteer at the school.

10. DIRECTORY OF CONTACTS

Designated Safeguarding Leads (DSLs)

Assistant Head Senior School	Mr Nick Taylor Tel No: (Office)	01772 684264
Deputy Head Pastoral Junior School	Mr Stuart Lewis Tel No: (Office)	01772 673222

The Deputy Designated Safeguarding Leads are:

Pastoral Manager Senior School	Mrs Helen Shuttleworth Tel No: (Office)	01772 684264
Pastoral Support (Attendance) Senior School	Mrs Anna Wadeson Tel No: (Office)	01772 684264
Head of Boarding-	Mrs Joanne Dinsley Tel No: (Office)	01772 688115
Deputy Head Academic Junior School	Mrs Kate Aldeen Tel No: (Office)	01772 673222
Pre-School Manager Junior School	Mrs Sharon Anyon Tel No: (Office)	01772 672811
EYFS Designated Safeguarding Lead for Nursery/Pre-School) Junior School	Mrs Sharon Anyon Tel No: (Office)	01772 672811

Others with responsibility for ensuring that safeguarding policies and procedures are robust within the school are:

The Head

Governing Body Child Protection and Safeguarding Representative, Mr K Berry

Lancashire County Council Safeguarding Advice (Early Years):

- Catherine Isherwood
Tel No: 01772 531555

Support and advice about extremism:

- Local Police Tel No: 101
- DfE helpline Tel No: 020 7340 7264
- report-extremism.education.gov.uk
- Lancashire Prevent Team:
- Tel No: 01254 585260

Child Sexual Exploitation:

- *Operation Awaken* (Blackpool, Fylde, Lancaster, Morecambe and Wyre): 01253 477261
- *Operation Engage* (Blackburn with Darwen, Burnley, Hyndburn, Ribble Valley, Pendle and Rossendale): 01254 353 525
- *Operation Deter* (Preston, Chorley, South Ribble, West Lancs): 01772 209122

LCC School Safeguarding Officers Victoria Wallace, Mechelle Lewis and Sarah Holyhead, Natalie Barton	01772 531196 Safeguardingadvice@lancashire.gov.uk
LCC MASH Education Officers Matt Chipchase & Martine Blokland	Martine Blokland 01254 220914 Matt Chipchase 01254 220989 mash.education@lancashire.gov.uk
LADO – Local Authority Designated Officer	01772 536694 LADO.admin@lancashire.gov.uk
MASH – Multi-Agency Safeguarding Hub Children's Social Care (CSC)	0300 123 6720 0300 123 6722 between 5.00 pm-8.00 am



PREVENT & CHANNEL REFERRAL PROCESS

Prevent is one of the elements of CONTEST, the UK government's counter-terrorism strategy and aims to stop people becoming terrorists or supporting terrorism.

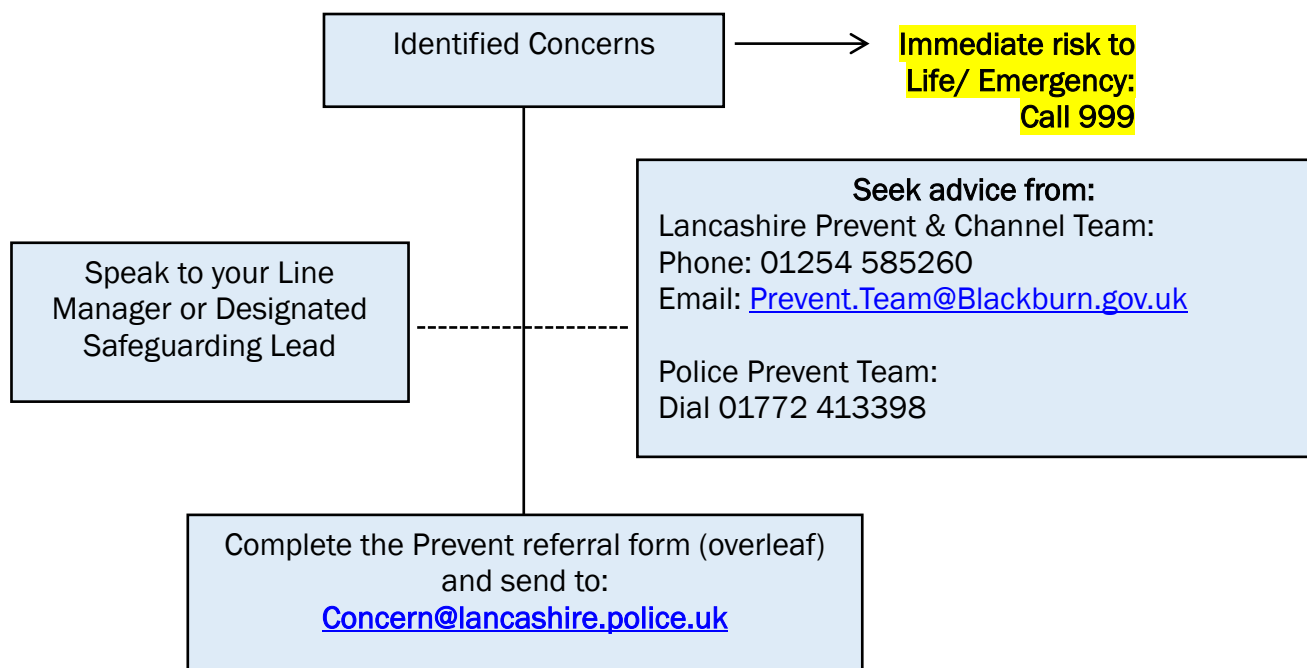
Prevent initiatives tackle both the causes and risk factors that can lead someone to become radicalised. It directly supports those who are at risk through early intervention, is resourced to risk and addresses **all forms of terrorism and extremism**. Prevent works in a similar way to other safeguarding processes designed to protect individuals whereby the level of intervention increases with the level of risk.

Radicalisation is the process by which a person comes to support terrorism and in some cases may then participate in terrorist activity. There is no single process or indicator of when a person might move to adopt violence in support of extremist ideas. The process is different for each individual and can take place over an extended period or a short time frame.

Extremism is defined in accordance with the government's current definition and the Prevent Duty guidance. Staff will use the current KCSIE and local Prevent guidance when assessing concerns rather than relying on historic wording in this appendix.

- If you **notice** a change in an individual that concerns you, in that they may be vulnerable to radicalisation, follow your organisation's safeguarding policy/ Prevent & Channel referral process.
- **Check** your concern with a manager or designated safeguarding lead and contact the Prevent team for advice.
- **Share** the concern with the police by completing the Prevent referral form.

Referrals will be screened for suitability through a preliminary assessment by the police. If suitable for multi-agency consideration, it will be passed to the local authority **Channel** team.



REFERRAL PROCESS	
By sending this form you consent for it to arrive with both your dedicated Local Authority safeguarding team & Prevent policing team for a joint assessment. Wherever possible we aim to give you feedback on your referral, please be aware, however, that this is not always possible due to data-protection & other case sensitivities. Once you have completed this form, please email it to: concern@lancashire.police.uk If you have any questions whilst filling in the form, please call: The Police Prevent Team / Local Authority Team / Organisation Prevent lead – contact details are at the end of the form	
INDIVIDUAL'S BIOGRAPHICAL & CONTACT DETAILS	
Forename(s):	First Name(s)
Surname:	Last Name
Date of Birth (DD/MM/YYYY):	D.O.B.
Approx. Age (if DoB unknown):	Please Enter
Gender:	Please Describe
Known Address(es):	Identify which address is the Individual's current residence
Nationality / Citizenship:	Stated nationality / citizenship documentation (if any)
Immigration / Asylum Status:	Immigration status? Refugee status? Asylum claimant? Please describe.
Primary Language:	Does the Individual speak / understand English? What is the Individual's first language?
Contact Number(s):	Telephone Number(s)
Email Address(es):	Email Address(es)
Any Other Family Details:	Family makeup? Who lives with the Individual? Anything relevant.

DESCRIBE CONCERNS	In as much detail as possible, please describe the specific concern(s) relevant to Prevent.
Please Describe	
FOR EXAMPLE: - How / why did the Individual come to your organisation's notice in this instance? - Does it involve a specific event? What happened? Is it a combination of factors? Describe them. - Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How? - Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact? - Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information? - Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly? - Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider any extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures. - Please describe any other concerns you may have that are not mentioned here.	
COMPLEX NEEDS	Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?
Please Describe	

PERSON WHO FIRST IDENTIFIED THE CONCERNS	
Do they wish to remain anonymous?	Yes / No
Forename:	Referrers First Name(s)
Surname:	Referrers Last Name
Professional Role & Organisation:	Referrers Role / Organisation
Relationship to Individual:	Referrers Relationship To The Individual
Contact Telephone Number:	Referrers Telephone Number
Email Address:	Referrers Email Address
PERSON MAKING THIS REFERRAL (if different from above)	
Forename:	Contact First Name(s)
Surname:	Contact Last Name
Professional Role & Organisation:	Contact Role & Organisation
Relationship to Individual:	Contact Relationship to the Individual
Contact Telephone Number:	Contact Telephone Number
Email Address:	Contact Email Address
FOR EXAMPLE: • Victim of crime, abuse or bullying. • Work, financial or housing problems. • Citizenship, asylum or immigration issues. • Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings. • On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency. • Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories. • Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below). • Please describe any other need or potential vulnerability you think may be present but which is not mentioned here.	
OTHER INFORMATION	Please provide any further information you think may be relevant, e.g. social media details, military service number, other agencies or professionals working with the Individual, etc.
Please Describe	

REFERRER'S ORGANISATIONAL PREVENT CONTACT (if different from above)	
Forename:	Referrers First Name(s)
Surname:	Referrers Last Name
Professional Role & Organisation:	Referrers Role/Organisation
Relationship to Individual:	Referrers Relationship To The Individual
Contact Telephone Number:	Referrers Telephone Number
Email Address:	Referrers Email Address

SAFEGUARDING CONSIDERATIONS	
Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues?	Yes / No
Please describe, stating whether the concern has been diagnosed.	
Have you discussed this Individual with your organisations Safeguarding / Prevent lead?	Yes / No
What was the result of the discussion?	
Have you informed the Individual that you are making this referral?	Yes / No
What was the response?	
Have you taken any direct action with the Individual since receiving this information?	Yes / No
What was the action & the result?	
Have you discussed your concerns around the Individual with any other agencies?	Yes / No
What was the result of the discussion?	

INDIVIDUAL'S EMPLOYMENT / EDUCATION DETAILS	
Current Occupation & Employer:	Current Occupation(s) & Employer(s)
Previous Occupation(s) & Employer(s):	Previous Occupation(s) & Employer(s)
Current School / College / University:	Current Educational Establishment(s)
Previous School / College / University:	Previous Educational Establishment(s)

RELEVANT DATES	
Date the concern first came to light:	When were the concerns first identified?
Date referral made to Prevent:	Date this form was completed & sent off?
THANK YOU	
Thank you for taking the time to make this referral. Information you provide is valuable and will always be assessed. If there is no Prevent concern but other safeguarding issues are present, this information will be sent to the relevant team or agency to provide the correct support for the individual(s) concerned.	

Contacts List:

Organisation Safeguarding / Prevent Lead:

Tel:

Email:

Local Authority Prevent and Channel Team:

Tel: 01254 585 260

Email: Prevent.Team@BLACKBURN.GOV.UK

Police Prevent Team:

Tel: 01772 413398

EYFS (Nursery/Pre-School) Safeguarding & Welfare Requirements

(Statutory from 1 September 2026; to be read alongside Section 3 and Section 6)

A. Designated Safeguarding Lead (DSL)

- An **EYFS DSL** must be appointed and **available whenever EYFS is operating**; duties align with the EYFS framework and local safeguarding procedures. (*KGS EYFS DSL: Mrs Sharon Anyon*).

B. Safer recruitment (EYFS-specific)

- Obtain verified **references before employment**; avoid open references; verify sources; record all vetting including **criminal record check reference/date**; **no unsupervised work or inclusion in ratios until suitability is confirmed**.

C. Child absence (EYFS)

- Maintain a **written EYFS attendance/absence procedure**; follow up immediately with parents and **two emergency contacts** for unexplained absence; consider patterns/trends and vulnerability; refer concerns to CSC and/or request a **police welfare check** as needed.

D. Two emergency contacts

- Hold **at least two emergency contacts** for every EYFS child and keep them up to date.

E. Toileting, nappy changing & supervision

- **Protect privacy** and maintain appropriate **sight/hearing supervision**; ensure safe spaces and records in line with safeguarding and welfare requirements.

F. Mobile phones, cameras, and images

- **Personal devices must not be used** for EYFS images. The policy must state **how/when setting devices are used and how images are stored**.

G. Training (EYFS Annex C)

- **All EYFS practitioners complete safeguarding training at least every 2 years**; the policy must **explain delivery and support** for practice. The EYFS DSL receives enhanced content (allegations, safer recruitment, online safety, local procedures).

H. Whistleblowing

- A **written whistleblowing procedure** is required; all EYFS practitioners must know how to use it.

I. Paediatric First Aid (PFA) & ratios

- **At least one PFA-qualified practitioner on site at all times**; **students/trainees require PFA to be counted in ratios**. Ratios are a safeguarding control and must be met at all times.

J. Safer eating

- Implement safer-eating controls (allergies, choking/food prep, supervision); reflect these in EYFS procedures and staff training.

K. Notifications

- Notify the regulator **without delay** of any serious safeguarding incident/allegation on EYFS premises in line with EYFS Section 3.