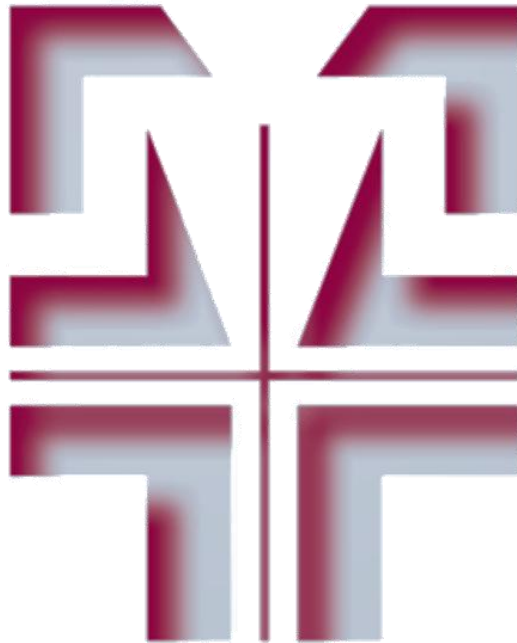


Saint Michael's CE High School

A Church of England Academy



Therefore, choose

Safeguarding and Child Protection Policy

September 2026

Lead Staff	Deputy Head (DSL) Mr Chadwick
Review date	September 2027
Approval: Governor (Committee)/ Headteacher	a. Learning b. Ethos, Staffing & Wellbeing c. Finance, Premises, Health & Safety d. Pay e. Full Governors' f. Headteacher
Location: Shared Policies	1. Statutory 2. Staffing/ Personnel 3. Premises/ Health and safety 4. Curriculum/ L&T 5. Wellbeing 6. Other?
Website Y/N	Yes/No

Our mission statement: As a vibrant learning community, we choose to serve God, pursue excellence and celebrate the uniqueness of each individual.



Our vision: Growing in body, mind and spirit

I have come that you might have life – life in all its fullness. **John 10:10**



Therefore choose [life]
Deuteronomy 30:19

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A. Named staff/personnel with specific responsibility for Child Protection

Academic Year	Designated Senior Lead & 'Back-Up' or Deputy DSL	Email
2026-2027	Mr John Chadwick DSL	jchadwick@saint-michaels.lancs.sch.uk
	Mrs J Monaghan Deputy DSL	jmonaghan@saint-michaels.lancs.sch.uk
	Mr J Kirkpatrick Deputy DSL	jkirkpatrick@saint-michaels.lancs.sch.uk
	Mrs R Rackstraw Deputy DSL	rrackstraw@saint-michaels.lancs.sch.uk

B. Training for Designated Staff in School

Name of Staff	Last DSL Training	Provided by	DSL training renewal
Mr J Chadwick	September 2026	LCC	September 2028
Mr J Kirkpatrick	February 2025	LCC	February 2027
Mrs J Monaghan	June 2025	LCC	June 2027
Mrs R Rackstraw	September 2026	LCC	September 2028

C. Whole School Child Protection Training

Who attended	Date (proposed)	Training Delivered by
All teaching staff	14 Sept 2026	JFC (DSL)
Support staff	Sept 2026	JFC (DSL)
All teaching staff, kitchen staff and cleaners	Oct 2026	JFC (DSL)
All teaching and support staff*	Oct 2026	JFC (DSL)

*Some staff unable to attend so alternative date Oct 2026 for these and kitchen / cleaning staff.

Regular updates to safeguarding training are shown on the CPD program.

Other useful contacts

Local Authority Designated Officer (LADO) Lancashire can be contacted on 01772 536694
LADO.admin@lancashire.gov.uk

LCC Schools Safeguarding Officer - Victoria Wallace 01772 531196
school.safeguarding@lancashire.gov.uk

Multi-Agency Safeguarding Hub (MASH) Education Officers

Jenny Ashton 01772 531643 jennifer.ashton@lancashire.gov.uk

Matt Chipchase 01254 220989 matt.chipchase@lancashire.gov.uk

Channel helpline – to raise concerns about extremism with respect to a pupil 020 7340 7264

Whistleblowing - 01772 532500 WhistleblowingComplaints@lancashire.gov.uk

Where there are immediate safeguarding concerns about a child or young person (level 4 of the Continuum of Need), you should make direct contact with MASH on the following number **or** the Police (999 in an emergency) and complete the referral form once the immediate concerns have been addressed. If the child you are concerned about already has an allocated Social Worker go directly to this person by contacting **0300 123 6720 (or 8pm-8am 0300 123 6722)**

1. Aims

In our school our Christian vision shapes all that we do. We are very much a 'team' at St Michael's; staff, pupils, parents and governors work closely together to ensure that every pupil has the opportunity to grow in body, mind and spirit; to flourish as a child of God and experience the joy and hope of 'life in all its fullness'.

We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. We aim to create a culture of vigilance by ensuring that;

- appropriate and timely action is taken to safeguard and promote children's welfare
- all staff are aware of their statutory responsibilities with respect to safeguarding
- staff are properly trained in recognising and reporting safeguarding issues
- we take all wellbeing concerns seriously
- we encourage all children to talk to us about anything that worries them
- we will always act in the best interest of the child

It is important to know that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, but this shouldn't stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies to safeguard and promote the welfare of their pupils
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

This policy also complies with our funding agreement and articles of association. It refers to locally agreed multi-agency procedures that have been put in place by the 3 safeguarding partners.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. [Appendix 1 of KCSiE 2026](#) explains the different types of abuse.

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

Children includes everyone under the age of 18.

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

- Lancashire County Council
- Lancashire and South Cumbria Integrated Care Systems
- Lancashire Constabulary

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and

recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- Have a social worker
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour for learning policy, and the safeguarding response to children who go missing from education
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment in order to help the family.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

Section 7 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Mr John Chadwick, Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding.

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

There are three deputy DSL's (all equally trained to DSL level) – Mr John Kirkpatrick, Mrs R Rackstraw and Mrs Joanne Monaghan. All DSL's may be involved in any situation and will cover if others are unavailable.

If the DSL and deputies are not available, Mrs Rachel Rongong (Headteacher) will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL's will be given the time, funding, training, resources and support to fulfil their role.

The key role of the DSL is to:

- Provide advice, support and training to other staff on child welfare and child protection matters
- Manage referrals from school staff or any others from outside the school
- Work with external agencies and professionals on matter of safety and safeguarding
- Raise awareness of safeguarding and child protection amongst the staff and parents
- Ensure that child protection information is transferred to the pupil's new school
- Be aware of pupils who have a social worker. (From June 2021 the virtual headteacher has responsibility to promote the education of such pupils and we work closely with virtual headteachers in each education authority)
- Take part in strategy discussions and inter-agency meetings and support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Understand the importance of information sharing, the relevant data protection legislation and keep detailed, accurate secure records including the rationale for decisions where referrals were or were not made.

The DSL will also:

- Keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Have a good understanding of harmful sexual behaviour
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. The appropriate adult is there to safeguard the rights, entitlements and welfare of the child.
- Work with others to ensure that the school's filtering and monitoring systems are functional and effective
- The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The governing board

The governing board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The governing board have appointed a governor safeguarding lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

5.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL's has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL's are absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

St Michael's recognises that all matters relating to Safeguarding and Child Protection are confidential. DSL's will disclose any information about a student to other members of staff on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. It should also be noted that

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should always be prepared to share information in a timely and lawful manner where doing so will protect a child from harm. The school will have regard to DfE Data Protection guidance and statutory safeguarding guidance when making decisions regarding information sharing.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

7. Recognising types of harm & abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

All staff and volunteers will act on any concerns they have about a child immediately.

All staff must report any concerns to their Line Manager / Pupil Manager as a minimum. If the concern is potentially of a safeguarding nature then a DSL must be informed. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

It is important to note that ‘harm’ can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

All staff should continue to log concerns on Synergy but remember that this is not a guarantee that it will be received and read immediately. Continue to verbalise concerns if immediate action may be required.

Remember all staff can report a concern to children’s social care and the police if they feel it necessary.

See appendix 1 for indicators of forms of abuse or harm.

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

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The following links will take you to the Lancashire’s ‘Children’s Safeguarding Assurance Partnership’ which explain in greater detail the local procedures in relation to safeguarding.

https://panlancashirescb.proceduresonline.com/chapters/p_referral_social_care.html

The following link is to the GOV.UK webpage for reporting child abuse to your local council:

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

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it

- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

Any member of staff who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18 must immediately report this to the police**, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Further information is available in appendix 4 of this document

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

Fig 1, page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. You may also refer to the phone numbers on page 4 of this policy.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

St Michael's recognises the role of Family Help services in providing support to children and families where needs are emerging. Staff should work with the DSL to consider Family Help support at the earliest opportunity and follow Lancashire safeguarding partnership referral pathways.

Extra-Familial Harm

'Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

Early help / Family help

Any child or family may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child or family who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory EHCP)
- has a mental health need
- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

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

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

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

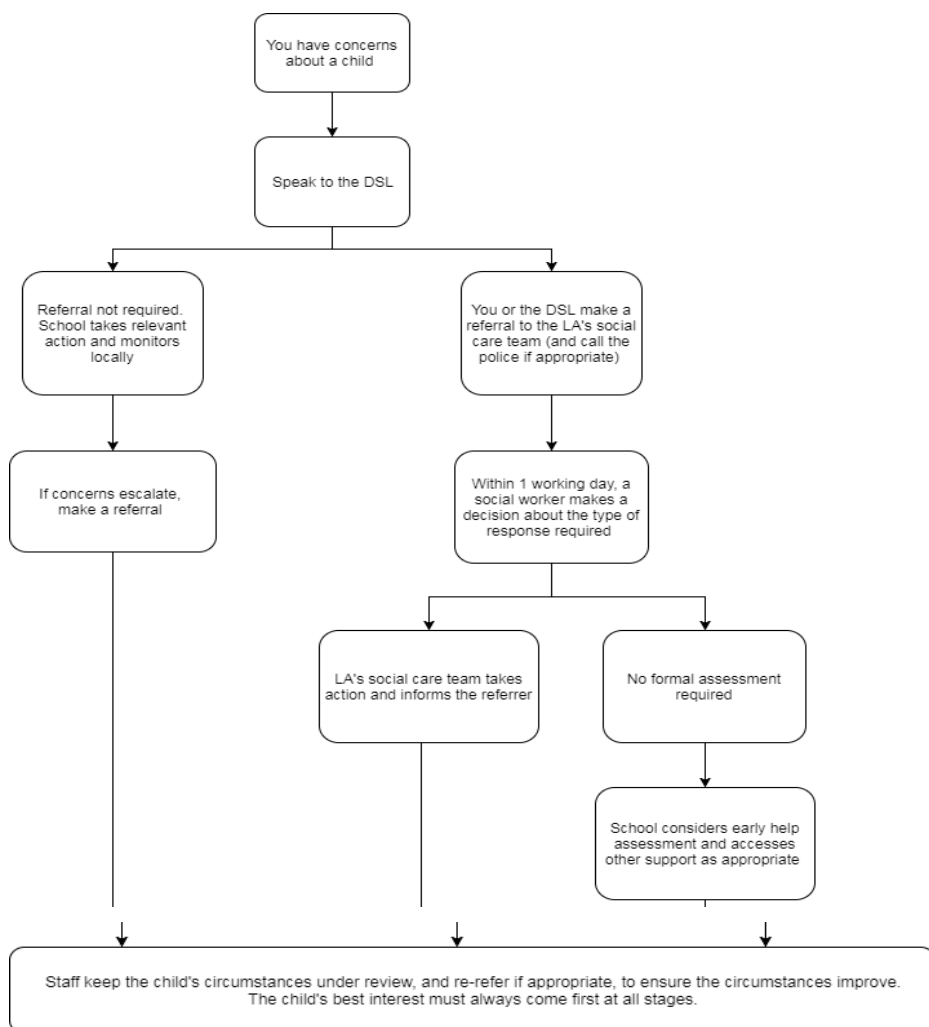
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.6 Concerns about a staff member including volunteers, supply teachers and agency staff (staff refer to code of conduct for further information)

It should be noted that in KCSiE 2026 Part 4 will be followed where it states that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school.

should be reported to the headteacher (or where that is not possible, to the DSL). If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

7.7 Child on child abuse, harmful sexual behaviour (HSB), sexual violence and sexual harassment

We recognise that children are capable of abusing other children. This can happen inside of school, outside of school and online. Abuse will never be tolerated or passed off as “banter”, “just having a laugh”, “boys being boys” or “part of growing up”.

We also recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child on child abuse is unacceptable and will be taken seriously.

It is important to recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.

Child on child abuse can take many different forms such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- online, this can take the form of abusive, harassing, misogynistic messages, the non-consensual sharing of indecent images, especially in chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

All staff are clear as to the school’s policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

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

- You must record the allegation and tell the DSL immediately, but do not investigate it

- The DSL may contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL may put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL may contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of child on child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by information given through tutorial time, assemblies, school website, student council, TV screens etc.
- Ensuring staff are trained to understand that a pupil harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Key definitions

Child-on-child sexual abuse: when a child (anyone under the age of 18) commits an act of sexual violence or harassment against another child

Sexual violence: rape, assault by penetration, or sexual assault (intentional sexual touching)

Sexual harassment: unwanted conduct of a sexual nature – such as sexual comments, sexual jokes or taunting, physical behaviour like interfering with clothes, or online harassment such as sharing or requesting nudes or semi-nudes (see 7.8 below).

Harmful Sexual Behaviour (HSB): sexual behaviour displayed by a child or young person that is developmentally inappropriate, may be harmful to themselves or others, and may be abusive. HSB can occur online or offline and includes behaviours such as sexual harassment, sexual violence, coercive behaviour, and the sharing or creation of nude, semi-nude or sexually explicit content. All incidents of HSB will be taken seriously and managed in line with safeguarding procedures.

Sexual activity is an offence if:

- Person B (the victim) does not consent
- Person A (the perpetrator) does not reasonably believe that Person B consents

Someone consents if they:

- Agree by choice
- Have the freedom and capacity to choose

Confidentiality and Anonymity

School will pay due regard to section 5 of KCSiE 2026 for situations where the victim of sexual violence or harassment asks school not to tell anyone about the incident. Advice will always be sought from the DSL who will follow the basic safeguarding principle: *if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.*

Parents or carers will normally be informed (unless this would put the victim at greater risk).

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.

Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

7.8 Sharing or requesting nudes or semi-nudes

Your responsibilities when responding to an incident

If you are made aware of such an incident you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101 in the first instance. Depending on the nature of the incident, school may choose to involve the services of our community police support officer.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording incidents of nudes or semi-nudes being shared.

Curriculum coverage

Pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. Much of this is covered as part of PSHE in our 'Living Education' lessons and specific, directed assemblies throughout the year. For example, teaching covers the following in relation to requesting or sending inappropriate images 'nudies':

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

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

Pupils are also made aware of the processes the school will follow in the event of an incident.

7.9 Children with mental health concerns

All staff at St Michael's are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, immediate action should be taken. They should raise the issue by informing the designated safeguarding lead or a deputy and logging the concern on Synergy.

7.10 Children with a social worker

At St Michael's, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

7.11 Private Fostering

There is a mandatory duty to inform the local authority of children in such arrangements.

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Staff should notify the DSL if they are concerned or become aware of possible private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

On admission to school, we will take steps to verify the relationship of the adults to the child who is being registered.

8. Notifying parents

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

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

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

In the case of allegations of abuse made against other children, we will normally notify each of the parents of the children involved.

9. Pupils with special educational needs and disabilities or certain health conditions

We recognise that pupils with special educational needs (SEND) and disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges

We offer extra wellbeing support for these pupils. This includes:

Access to the Personalised Learning Centre and the support from the specialist staff in there in consultation with Pupil Managers / SENDCO as agreed.

Mentoring of SEND pupils the SENDCO, an experienced HLTA or other appropriately trained staff. Support from specialist teachers with particular regard to the safety and well-being of pupils with social and communication difficulties, physical and sensory issues and social, emotional and mental health needs.

Close and frequent liaison between the SENDCO and parents as well as health/mental health and social care or child/family support professionals.

10. Searching and Confiscation

Under common law, Section 2 of the 2011 Education Act and DFE Guidance Feb 2014, Headteachers and staff authorised by them have a statutory power to search pupils or their possessions, **without consent**, where they have reasonable grounds for suspecting that the pupil may have a prohibited item. Prohibited items are:

- Knives and weapons
- Alcohol
- Illegal drugs
- Stolen items
- Tobacco, cigarette papers, cigarettes and e-cigarettes
- Fireworks
- Pornographic images
- Any item deemed inappropriate or that has been or is likely to be used to commit an offence, cause personal injury or damage to property

School also reserves the right to search the content of a confiscated mobile device where there is a reasonable suspicion that it may contain undesirable material, including those which promote pornography, violence or bullying.

Whenever it is deemed necessary to search a child or their possessions the following applies:

- It must be done by an authorised member of staff (in the case of St Michael's, the authorised staff include the Headteacher and a Designated Safeguarding Lead DSL)
- The staff member must be of the same sex as the student*
- There must be another member of staff present as a witness – also of the same sex, if possible*
- Searches can only be carried out on school premises, or where staff have control of pupils (education visits etc.).
- Searches will not require the removal of clothing, apart from outer clothing
- Pockets can be searched but there will be no form of intimate search
- Reasonable force can be used, as required
- There is no requirement to notify parents, either before or after the search
- There is no requirement to keep a written record of any search carried out

* We can carry out a search of a pupil of the opposite sex without a witness present, but only where we reasonably believe that there is a risk that serious harm will be caused to a person if we do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff.

Items can be seized and retained and dealt with in an appropriate manner. Weapons and drugs must be handed over to the Police.

Data and files from mobile phones and other electronic devices may be examined if there is reason to do so. If it is decided to return the item to the pupil, any data or files may be erased if there is reason to do so.

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (March 2024).

Intimate searching

A more intimate search is a search involving the removal of more than outer clothing. These can only be carried out by police officers under the [Police and Criminal Evidence Act 1984 \(PACE\) Code A](#) and in accordance with the [Police and Criminal Evidence Act 1984 \(PACE\) Code C](#)

While the decision to undertake the search itself and its conduct are police matters, school staff will retain a duty of care to the pupil(s) involved and will advocate for pupil wellbeing at all times.

Before calling police into school, we will assess and balance the risk of a potential search on the pupil's mental and physical wellbeing and considering if other less invasive approaches have been exhausted.

Once the police are on school premises, the decision on whether to conduct the search lies solely with them, and the role of the school will be to advocate for the safety and wellbeing of the pupil(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, school will inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult*.

School will keep records of all such searches that have been conducted on school premises.

Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be an appropriate adult*

*the appropriate adult might be a parent or carer of the child or a member of staff of the same sex who has been requested by the child and authorised by the headteacher.

11. Children who are Lesbian, Gay, Bi or Gender Questioning

The school will approach matters relating to children questioning their gender in a safeguarding-centred manner. Decisions will be child-focused, evidence-based, involve parents wherever appropriate and take account of any co-existing vulnerabilities, safeguarding concerns, SEND needs, mental health considerations or risks of harm.

The fact that a child or a young person may be LGB is not in itself an inherent risk factor for harm. However, children who are LGB can be targeted by other children. In some cases, a child who is perceived by other children to be LGB (whether or not) can be just as vulnerable as children who identify as LGB.

Risks can be compounded where children who are LGB lack a trusted adult with whom they can be open. We endeavour to reduce the additional barriers faced by providing members of staff to speak to about their worries.

Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities.

12. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or offices/cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones, tablets or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

Further information about the use of mobile phones and cameras can be found in the 'Mobile Device Policy'.

13. Artificial Intelligence (AI), Filtering, Monitoring and Online Safety

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use pupils mobile devices MUST remain switched off and out of site whilst on the school premises.

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. We 'monitor' in several ways including:

- Physical monitoring
- Live software monitoring
- Monitoring user logs
- Monitoring individual devices

We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.

At least once a year the designated safeguarding lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns

All our staff take part in annual cybersecurity training

Children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

The governing board receives regular assurance reports regarding the effectiveness of filtering and monitoring systems and understands its strategic responsibility for online safeguarding.

Please refer to our separate policy on 'online safety' that refers to how children will be kept safe when they are accessing 'online learning' both in or out of school.

13.1 Artificial Intelligence (AI)

St Michael's recognises that artificial intelligence (AI), including generative AI tools, chatbots, image generators, voice cloning technologies and deepfake technologies, presents both opportunities and safeguarding risks for children and young people.

The school will ensure that safeguarding procedures reflect emerging technologies and that staff remain vigilant to risks associated with AI-enabled harm.

Staff will remain alert to the misuse of generative artificial intelligence in relation to online grooming, exploitation, impersonation, sextortion, the creation of child-on-child abuse material, and the generation or manipulation of safeguarding disclosures or evidence.

AI-related safeguarding concerns may include, but are not limited to:

- AI-generated or manipulated images, videos or audio recordings.
- Deepfake content involving pupils, staff or members of the wider community.

- AI-generated nude or semi-nude images.
- Bullying, harassment or intimidation using AI-generated content.
- Online grooming involving AI-generated communications or personas.
- Impersonation of trusted adults, family members or peers.
- The creation and sharing of misinformation or disinformation.
- Exposure to harmful, extremist, self-harm or age-inappropriate content generated through AI systems.
- The inappropriate disclosure of personal, sensitive or safeguarding information into AI platforms.
- Financial scams, phishing attempts and online exploitation facilitated through AI technologies.

Any concerns regarding AI-generated content involving a child will be managed in line with this Child Protection and Safeguarding Policy and relevant statutory guidance.

13.2 Misinformation, disinformation and conspiracy theories

Staff and pupils to understand what is meant by the following;

- **Misinformation:** False or misleading information shared by mistake.
- **Disinformation:** False information shared deliberately to deceive.
- **Conspiracy Theories:** Unfounded claims suggesting secret plots, often without credible evidence.

Also to include introducing critical thinking tools:

- Check the source: Is it reliable?
- Look for evidence: Are there facts or just opinions?
- Compare with other sources: Do others say the same thing?
- Discuss real-life examples of viral misinformation and how it spread.
- Explore how algorithms and social media can reinforce false beliefs.

Staff to receive regular training on how they can reinforce the importance of this to the children. Update the PSHE curriculum and ICT curriculum to include each of these. Work with parents / carers to reinforce these messages at home.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Other complaints

Please refer to our 'complaints policy'.

14.3 Whistle-blowing

Please refer to our 'Whistle-blowing policy'. The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

15. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on Synergy. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professionally need to see them.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- The vast majority of records are kept electronically on Synergy.
- Access to safeguarding and wellbeing logs on Synergy is not universal. Levels of access according to the issue are in place.
- Records concerning the safeguarding of a pupil is passed onto other establishments only when confirmation of their attendance has been received. This is then logged in line with KCSiE 2026.

See 'Confidentiality' section above which explains how the school shares information with other agencies and when this is appropriate, in line with our local safeguarding procedures.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

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

Staff will also receive regular safeguarding and child protection updates (for example, through emails, bulletin and wellbeing meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and Deputies

The DSL and deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. Training will be updated at least every two years, and their knowledge and skills will be refreshed at regular intervals and at least annually to keep up with developments in safeguarding practice, legislation and local procedures.

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

They will also undertake Prevent awareness training.

16.3 Governors

Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher.

16.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. Staff will complete refresher training every 2 years.

17. Allegations and Low level Concerns

These allegations or concerns are about any adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors.

We recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the Chair of Governors who can be contacted via the clerk to the governors by contacting the school office.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The headteacher will decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for 'allegation' set out below.

Allegations

It is an allegation if the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

Allegations should be reported to the Local Area Designated Officer 'without delay'.

Low-level Concerns

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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites

- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

18. Use of school premises for non-school activities

When services or activities are provided by the school, under the direct supervision or management of the school staff, our normal arrangements for child protection apply. However, where services or activities are provided separately by another body this is not necessarily the case. When this is the case we will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on our school roll.

Where safeguarding concerns arise relating to individuals or organisations using school premises, these concerns will be managed in accordance with safeguarding procedures and referred to relevant agencies where appropriate.

19. Monitoring arrangements

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

20. Links with other policies

This policy links to the following policies and procedures:

- Behaviour for Learning
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Single Equalities Policy
- Relationships and Sex Education
- Whistle-blowing
- Anti-bullying
- First aid
- Privacy notices

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

Appendix 1: types of abuse

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

'Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.'

Appendix 2: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Suspension

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case

manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

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

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

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

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

This will include consideration of (as applicable):

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

Appendix 3: specific safeguarding issues

This appendix is based on the advice in annex A of Keeping Children Safe in Education.

Children who are absent from school

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Unexplained or persistent absences from school can be an indicator of abuse, neglect and exploitation and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

The school recognises that persistent absence, severe absence and children missing education may be indicators of abuse, neglect, exploitation, child criminal exploitation, child sexual exploitation, mental health concerns or other safeguarding risks.

We monitor attendance carefully and address poor or irregular attendance without delay.

When the whereabouts of a child is unclear or unknown, it is reasonable to expect that the local authority and/or the school will complete a home visit and if necessary, make enquiries with neighbours/relatives.

Whenever possible, parents will always be informed of a potential home visit. This contact may be the day before or on the day of the visit. Home visits are mainly used for the following reasons:

- If there is a safeguarding concern
- A child is refusing to come into school
- When there are attendance issues/concerns
- When several communication attempts have been made but no response received
- When school have failed to 'cast eyes' on a child for several days (this depends on the perceived vulnerability of the child)

If a home visit is made and there is no response. A note of the visit will be posted through the letter box. However, if the visit raises concerns, depending on the nature of the concern or the vulnerability of the child the police/other agencies may well be contacted at this initial stage.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2026) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Please see Appendix 10 of the Attendance Policy for when a home visit might be made.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

Child Criminal Exploitation (CCE) (including 'serious violence')

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 20 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in **serious violence**, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other

- (a) physical or sexual abuse
- (b) violent or threatening behaviour
- (c) controlling or coercive behaviour
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services)
- (e) psychological, emotional or other abuse

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. It is important to know that;

- Children who witness domestic abuse are also victims
- Witnessing domestic abuse can have a lasting impact on children
- Children can be victims in their own relationships too

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Operation Encompass

St Michael's is part of Operation Encompass. This is a unique Police and Education early intervention safeguarding partnership which ensures that school is informed, prior to the start of the next school day, that there has been an incident of Domestic Abuse to which the child or young person has been exposed, and which might then have an impact on them in school the following day.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation 'The Prevent Duty'

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people from being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the Behaviour for Learning policy and online safety policy.

Checking the identity and suitability of visitors

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

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

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will always seek to contact parents / carers immediately to make suitable arrangements. Children are welcome to stay in the Armstrong centre or other supervised classroom in school until someone is able to collect them.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, members of staff will search areas of school where the child is likely to be and speak to friends of the child to see if they know where they may be. If the child cannot be found, we will immediately contact parents/ carers to inform them of such who in turn will be asked to try and make contact with their child. If the child can still not be contacted/located then, in liaison with the parents, the police may be informed.

Appendix 4 Safer recruitment policy

Recruitment and selection process

The recruitment steps outline below are based on part 3 of Keeping Children Safe in Education (KCSIE) 2026.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children
- › That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- › Consider any inconsistencies and look for gaps in employment and reasons given for them
- › Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

› Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- If they are known to the policy and children's local authority social care and
- If they have been disqualified from providing childcare

› Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

When seeking references we will:

- › Not accept open references (for example, "To whom it may concern")
- › Not rely on applicants to obtain their reference
- › Liaise directly with referees and verify any information contained within references with the referees
- › Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer
- › Ensure electronic references originate from a legitimate source
- › Contact referees to clarify where information is vague or insufficient information is provided
- › Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed

- › Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- › Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- › Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- › Explore any potential areas of concern to determine the candidate's suitability to work with children
- › Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- › Obtain a separate barred list check:
 - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
 - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Ensure they are not subject to a prohibition order if they are employed to be a teacher
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)

- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

› Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

*Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Regulated activity is work that a barred person must not do. It means a person who will be:

Activity	Frequency
• Teaching, training, instructing, caring for, or supervising children • Providing advice or guidance on physical, emotional or educational wellbeing • (For paid workers) Doing any other paid work in school that provides an opportunity for contact with children	• Frequently (once a week or more), or • On more than 3 days in a 30-day period, or • Once at any time between 2am and 6am and with opportunity to have face-to-face contact with children
• Driving a vehicle only for children and their carers or supervisors	• Frequently (once a week or more), or • On more than 3 days in a 30-day period, or
Providing intimate or personal care, including: • Assisting with toileting, washing, bathing and dressing due to a child's age, illness or disability • Assisting with eating and drinking due to illness or disability • Providing health care (physical or mental health)	• Any time, even if only once
Moderating a public electronic interactive communication service (e.g. the school's social media platforms) which is likely to be used wholly or mainly by children	• Any time

The above applies to both paid staff and volunteers, aside from where stated '(For paid workers only)'.

Existing staff and volunteers

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

- › There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- › We believe the individual has engaged in [relevant conduct](#); or
- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- › We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- › An enhanced DBS check with barred list information for contractors engaging in regulated activity
- › An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

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

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- › Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- › Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- › For any existing volunteer who is considered to be engaging in a regulated activity from 1 September 2026:
 - Obtain an enhanced DBS check with children's barred list information; or
 - Obtain a standalone barred list check where:
 - We wish to allow the volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate; or
 - We have recently obtained an enhanced DBS check without children's barred list information, and there has been no break in service since that certificate was issued
- › Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors and Members

All trustees and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees and members will also have the following checks:

- › A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#))
- › Identity
- › Right to work in the UK

» Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 5 Recruitment of ex-offenders policy

1. Introduction

St Michael's meets the requirements for exemption from the Rehabilitation of Offenders Act 1974.

This means that, where a role involves regulated activity, applicants are required to disclose **relevant** convictions and cautions (excluding exemptions – see section 2) if **shortlisted** for employment in our school.

Roles involving regulated activity will also be subject to an enhanced Disclosure and Barring Service (DBS) check with barred list check.

Having a criminal record will not necessarily bar you from working at our school. The success of your application will depend on your suitability for the job, the nature of the role, and the circumstances and background of any offences.

We are committed to:

- . Our duty to safeguard children under:
 - o [Keeping Children Safe in Education](#)
 - o [The DBS code of practice](#)
- . The fair treatment of all applicants and equality of opportunity

2. Protections and exemptions

'Specified offences' will always be disclosed on a DBS certificate, and should always be included in self-declarations – see the [government's list](#) for further details.

It is a criminal offence for any person who is barred from working with children to apply for a position in a school. St Michael's will make a report to the DBS and/or the police as appropriate, if it receives an application from a barred person.

'Protected offences' are certain old or minor offences that may not be disclosed on a DBS check. Guidance as to whether a caution or conviction is 'protected' can be found in:

- . The Ministry of Justice's [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#)
- . The government's tool to [check whether to disclose cautions or convictions](#)

Applicants **should not** list any 'protected' offences on their self-declaration form, and we will not take them into account if we are made aware of them.

3. Responsibilities

3.1 The headteacher

- . Uphold St Michael's commitment to the fair treatment of all job applicants
- . Make sure all job application forms contain clear and relevant information about what cautions or convictions applicants are expected to disclose, and what safeguarding checks the school will carry out, and at what stage in the application process
- . Make sure staff involved in the recruitment process have received appropriate guidance and training about their legal duties in employing ex-offenders, and assessing the relevance and circumstances of offences

3.2 Staff involved in the recruitment process

- . Treat applicants fairly, including in relation to any history of offending

- Maintain privacy for applicants, making sure that information about applicants' criminal records won't be seen by anyone outside of the recruitment process
- Make sure that all shortlisted applicants complete a self-declaration form before the interview stage, and that all job offers are conditional, subject to appropriate safeguarding checks
- Hold discussions with applicants about their disclosures, where relevant, and make decisions about suitability based on the circumstances and background of offences
- Seek specialist legal/HR advice where relevant

3.3 All job applicants

- Familiarise themselves with the requirements for self-disclosure, and whether they have any previous convictions or cautions that must be disclosed
- Complete self-declaration forms honestly and completely, disclosing all required spent and unspent convictions and cautions (excluding 'protected' offences)
- Participate in disclosure discussions following either or both of their self-declaration and DBS check

4. The process for disclosing and assessing previous convictions

4.1 Self-declaration

All shortlisted applicants will be asked to complete a self-declaration form before the interview stage. Applicants must complete these forms accurately, and reveal all relevant convictions, as well as any other information that would make them unsuitable to work with children. Failure to reveal any relevant information could lead to the withdrawal of an offer of employment.

All job application forms will include information about this requirement.

Applicants will not be asked for information about previous convictions or cautions before this stage, and any such information that is disclosed before shortlisting stage won't be taken into account in the shortlisting process.

We will store all sensitive personal data securely, only share it with relevant staff members, and destroy it securely when we no longer need it.

Further disclosure discussions (see sub-section 4.3) may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

4.2 DBS checks

Successful candidates are subject to DBS and other safeguarding checks, as set out in statutory guidance, Keeping Children Safe in Education. Staff should consider whether:

- The checks reveal any new information that might prohibit or otherwise make a candidate unsuitable for the role
- The checks match any information disclosed in an applicant's self-declaration

Further disclosure discussions (see sub-section 4.3) may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

4.3 Disclosure discussions

Where a disclosure or the results of a DBS check reveal that an applicant is barred from the role or ineligible to be employed in that role, their recruitment process will not proceed any further, and they will be informed that they legally cannot be considered for the job.

In all other cases, previous convictions will not necessarily prevent applicants from being employed by our school. Staff will determine, with support from HR specialists, whether disclosures warrant a discussion between our school and the candidate.

Where relevant, disclosure discussions will happen as part of the interview process and take the applicant's explanation into consideration. For example, we will consider:

- . The seriousness of any offence and relevance to the post applied for
- . How long ago the offence occurred
- . Whether it was a one-off incident or a history of incidents
- . The circumstances around the incident
- . Whether the applicant accepted responsibility for their actions

Staff will then assess whether applicants' previous convictions or cautions make them unsuitable for the role.

We will not ask applicants about protected convictions and cautions.

A section 128 check will be requested for all roles that relate to the management of the school including but not limited to governors, trustees, directors and headteachers.

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