



**Kingsholm C of E Primary School and Nursery
Safeguarding and Child Protection Policy 2026 - 2027**

'Everyone Matters'

Luke 10.25-27

Rooted in our Christian vision we seek to enable every child to experience life in all its fullness. Safeguarding is central to this; through our Christ-like attitude, we are committed to promoting the safety, welfare, and flourishing of all children in our care.

This policy applies to all staff, governors, students, volunteers, contractors and visitors at Kingsholm C of E Primary School and Nursery.

Governor Committee Responsible:	Full Governing Body	Staff Lead:	Lucinda Field Engagement and Relationship Manager/Designated Safeguarding Lead (DSL)
Status	Statutory	Review Cycle	Annual / Biennial / Tri-annual
Ratified by	Chair of Governors	Ratification date	07 September 2026
Next Review Date	September 2027	To be read in conjunction with these policies	Positive Behaviour for Learning Code of conduct Attendance Online safety Whistleblowing SEND Equality and Objectives Relationships and sex education KCSIE 2026 Working Together to Safeguard Children 2026 Children Missing from Education

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Important contacts

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Lucinda Field Engagement and Relationship Manager Prevent Lead	01452 530777
Deputy DSL (DDSL)	Cathy Pascoe Operational Safeguarding Lead and Lead Practitioner for Family Support	01452 530777
Deputy DSL (DDSL)	Tony Larner Head	01452 530777
Deputy DSL (DDSL)	Hayley Hanson Deputy Head & Senior Mental Health Lead	01452 530777
Deputy DSL (DDSL)	Michelle Ginn Assistant Head/SEND/CO/Designated Teacher for Looked After Children/Medical & Allergy Lead	01452 530777
Deputy DSL (DDSL)	Debbie Herridge Learning Mentor and Cool Kids Lead	01452 530777
Local authority designated officer (LADO)	LADO Team The Role of the LADO & The Allegations Management Process Gloucestershire County Council	01452 426994 amadmin@gloucestershire.gov.uk
Chair of Governors Safeguarding Governor	Sophie Kingscote Bethan Morgan	Chair@kingsholm.gloucs.sch.uk bmorgan@kingsholm.gloucs.sch.uk
Multi-Agency Safeguarding Hub (MASH) Front Door to Children's Services.	Gloucestershire County Council	01452 427070 mashearlyhelp@gloucestershire.gov.uk
The Early Help Co-Ordinator Practitioner Advice Line	Gloucestershire County Council	01452 426644 9am – 4pm weekdays
Counter-Extremism helpline (Channel)	Home Office	020 7340 7264
National Police Prevent Helpline	Police	0800 011 3764
GSCP Website Gloucestershire Safeguarding Children Partnership Gloucestershire Safeguarding Children's Partnership	Gloucestershire County Council	GSCP@gloucestershire.gov.uk
Gloucester Diocese Safeguarding – Diocese of Gloucester	Gloucester Diocese	Church House, 5 Denmark Road, Glos GL1 3HW 01452 410022

Aims

Kingsholm C of E Primary School and Nursery aims to ensure that:

- Appropriate action is taken promptly to safeguard children and promote their welfare, including early identification of need and timely access to Family Help/Early Help support.
- All staff understand and comply with their statutory safeguarding responsibilities in line with Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.
- All staff receive regular, appropriate training to recognise, respond to, and report safeguarding and child protection concerns.
- We provide an environment in which children feel safe, secure, valued, and respected, are listened to, and know how to seek help from trusted adults if they are worried or in difficulty.

Policy Statement

Under statutory guidance and legislation, action must be taken to safeguard and promote the child's welfare, Kingsholm C of E Primary School and Nursery is committed to doing this. This action is defined in Working Together to Safeguard Children as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online. We will work in partnership with other appropriate agencies to ensure there are effective arrangements to identify, assess and support children who may be at risk of or suffering harm and respond to their needs. This is in compliance with statutory guidance KCSIE 26.

We recognise that effective safeguarding is anti-discriminatory and anti-racist. All adults (Including trainee teachers, temporary staff, supply staff, volunteers and governors) working in or on behalf of the school should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability which can impact children and families' lives. In addition, they share a responsibility to provide a safe environment in which children can learn and develop. The welfare of the child is our paramount consideration in all decision making.

Through our curriculum and wider provision, we help pupils to develop their understanding of how to keep themselves safe (including online), how to seek help, and how to build resilience. We are committed to ensuring that all pupils feel able to talk to a trusted adult about any worries or concerns and are confident that they will be listened to and taken seriously.

We aim to provide a caring, positive, safe and stimulating environment that promotes the social, emotional, spiritual, moral and cultural development of every child.

Principles

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who meets children and their families has a role to play. To fulfil this responsibility effectively, all practitioners must adopt a child centred approach, keeping the best interests of the child at the heart of all actions.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who meets them must play a role in identifying concerns, sharing relevant information and taking prompt, appropriate action, in line with statutory guidance and local procedures.

All staff are made aware of the systems, policies and procedures that support safeguarding at Kingsholm C of E Primary School and Nursery. Induction and ongoing training ensure staff understand and can act on these systems, including how to report and record concerns. Staff have a robust understanding that 'it can happen here', there is a culture of ongoing professional curiosity, and an expectation that staff will act immediately if there are safeguarding concerns.

This Safeguarding and Child Protection Policy forms part of our wider, integrated safeguarding arrangements, which also include (but are not limited to) policies and procedures on:

- Safeguarding Statement and local Safeguarding Children Partnership guidance
- Acceptable Use (pupils and adults) and online safety
- Anti-Bullying
- Attendance
- Behaviour
- Complaints
- Curriculum
- Health and Safety
- Intimate Care
- Lone Working
- Whistleblowing
- Children in Care / Looked After Children
- Offsite Visits and Educational Visits
- Positive Handling
- Risk Assessments
- Safer Recruitment
- Relationships and Health Education
- Special Educational Needs and Disabilities (SEND)
- Use of Photographs and Video in School
- Social Media
- Staff Code of Conduct
- The role and responsibilities of the Designated Safeguarding Lead (DSL) and deputies
- Mobile phone usage (Staff and pupils) - Kingsholm Digital Safety Policy

Some of these documents relate specifically to staff and are therefore not published on the school website, but all are available to staff, visitors and governors electronically on the virtual Hub, or as paper copies in the office.

Section 2 Safeguarding Legislation and Guidance

This policy is based on and should be read alongside the following statutory guidance and documents:

- Department for Education (DfE) statutory guidance: Keeping Children Safe in Education (KCSIE) 2026 https://assets.publishing.service.gov.uk/media/6a4cf903b7203c4c023fd2f3/Keeping_children_safe_in_education_2026_.pdf
- Working Together to Safeguard Children (2026) https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf
- Maintained Schools Governance Guide <https://www.gov.uk/government/publications/maintained-schools-governance-guide/maintained-schools-governance-guide>

The school complies with these requirements and with the arrangements agreed and published by our three local safeguarding partners (see Section 3).

This policy also reflects and is underpinned by the following legislation and statutory guidance:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out the requirements for the single central record and require at least one person on any appointment panel to have undertaken safer recruitment training
- The Children Act 1989 and the Children Act 2004, which provide the legal 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 FGM appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities for safeguarding and supporting girls at risk of or 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 'regulated activity' in relation to children
- Statutory guidance on the Prevent duty, issued under the Counter-Terrorism and Security Act 2015, which sets out schools' responsibilities to protect children from the risk of radicalisation and extremism
- The Human Rights Act 1998, which incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic law and confirms that being subjected to harassment, violence and/or abuse, including sexual violence or harassment, may breach several ECHR rights
- The Equality Act 2010, which makes it unlawful to discriminate against individuals based on protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). Governing boards and headteachers must consider carefully how they are supporting pupils regarding these characteristics, including by taking proportionate positive action and making reasonable adjustments for disabled pupils
- The Public Sector Equality Duty (PSED), which requires public bodies, including schools, to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity, and foster good relations between different groups
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (the "2018 Childcare Disqualification Regulations") and the Childcare Act 2006, which set out who is disqualified from working with children
- The statutory framework for the Early Years Foundation Stage (EYFS), in respect of safeguarding and welfare requirements
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)
- [Generative artificial intelligence \(AI\) in education - GOV.UK](#)

All school staff must be aware of, and act in accordance with, the procedures established by the Gloucestershire Safeguarding Children Partnership (or successor multi-agency safeguarding arrangements). The school provides regular training and updates to ensure that staff understand and can follow these procedures.

Section 3	Definitions
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Under Keeping Children Safe in Education (KCSIE) 2026, "safeguarding and promoting the welfare of children" is defined as:

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

Key staff are aware of the criteria and process for community-based Family Help assessments including the level of need, for when a case should be referred to Family Help support and services provided at:

- Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
- Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)

All staff are aware of the criteria and process, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)

- Section 31 of the Children Act 1989 (care and supervision orders), and
- Section 20 of the Children Act 1989 (duty to accommodate a child)

Core safeguarding and child protection definitions

- **Children:** Anyone who has not yet reached their 18th birthday. This includes children living with birth or extended families, those in kinship care, adopted children, and looked after children (including those in foster care or residential settings).
- **Child protection:** Targeted activities and statutory interventions undertaken to safeguard individual children who are suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.
- **Abuse:** A form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can occur in family, institutional or community settings, and online as well as offline.
- **Neglect:** A 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. This may involve a parent or carer failing to provide adequate food, shelter or clothing; failing to protect a child from physical and emotional harm or danger; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment. It may also include unresponsiveness to a child's basic emotional needs.
- **Making or sharing nudes and semi-nudes:** The creation, possession or distribution of self generated intimate images and/or videos of children, whether apparently consensual or non-consensual. This includes images or videos taken, sent, posted or shared via photographs, recorded media or live streams. In line with KCSIE 2026, this extends to wholly AI-generated or digitally manipulated intimate images (such as "deepfakes") that are used to harass, exploit or abuse a child. All such incidents require an immediate safeguarding response and will never be treated as normal or harmless peer behaviour.

Under statutory guidance and legislation, action must be taken to safeguard and promote the child's welfare. Effective safeguarding is anti-discriminatory and anti-racist. All practitioners should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability which can impact children and families' lives.

Multi-agency safeguarding governance

The school works within the local multi-agency safeguarding arrangements to safeguard and promote the welfare of children, including identifying and responding to need and risk.

In accordance with the Children Act 2004 (as amended by the Children and Social Work Act 2017) and Working Together to Safeguard Children (2026), the three statutory safeguarding partners for our area are:

- The Local Authority (LA)
- The Integrated Care Board (ICB) for local health services
- The Chief Officer of Police for the relevant police area

These partners share equal responsibility for designing, funding, implementing and reviewing local safeguarding arrangements. Kingsholm C of E Primary School and Nursery is committed to:

- Sharing information with safeguarding partners and other agencies in a lawful, timely and transparent manner
- Participating in local safeguarding audits, reviews and quality assurance processes
- Working in partnership to prevent and respond to child-on-child abuse, exploitation and other contextual safeguarding risks
- Engaging actively in Family Help and other early help arrangements, so that children and families receive support as soon as needs emerge

Site Safety

Risk assessments are undertaken and maintained in accordance with the school's health and safety policy. The school ensures that when our premises are hired or rented to other organisations (ASC, evening and weekend clubs) including shared site providers who work with children, those organisations adhere to the guidance for out-of-school settings.

Off Site Safety

We carry out a risk assessment prior to any off-site visit and designate the specific roles and responsibilities of each adult, whether employed or volunteers.

Pupil-centred terminology: victims and perpetrators

When recording, managing or responding to incidents of child-on-child abuse (including harassment and violence), the school adopts a supportive, non-stigmatising and trauma-informed approach:

- **Victim-centred support:** "Victim" is a recognised legal and safeguarding term. However, not all children who have experienced abuse wish to be described in this way. Staff will listen to and respect how a child wishes to describe their own experience, while ensuring that statutory responsibilities are met.
- **Contextualising harmful behaviour:** The terms "alleged perpetrator" and "perpetrator" are used in safeguarding and legal processes to identify and manage risk. Staff are expected to use these terms sensitively, particularly in front of children, and to recognise that a child's harmful behaviour may itself indicate that the child has unmet needs or is experiencing abuse, trauma or exploitation.
- **Case by case decisions:** The Designated Safeguarding Lead (DSL) will decide, on a case-by-case basis, what terminology is appropriate in internal records, multi-agency referrals and direct work with children, balancing the need for clarity with the need to protect children's dignity and emotional wellbeing.

Section 4	Equality Statement
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Some children are more vulnerable to abuse and neglect, both online and offline, and may face additional barriers to recognising, reporting or disclosing concerns. Kingsholm C of E Primary School and Nursery is committed to anti-discriminatory practice and to promoting equality of opportunity. We recognise children's diverse and intersecting identities and circumstances, and we strive to ensure that every child receives the same high standard of protection.

We give particular consideration to, and actively monitor the wellbeing and safety of, children who:

- Have special educational needs (SEN), disabilities, neurodivergent profiles or chronic health conditions (see Section 10)
- Are young carers, who may be providing ongoing care or support for a family member
- May experience discrimination, targeting or harassment because of their race, ethnicity, religion or belief, sex, gender questioning, gender reassignment or sexual orientation
- Have English as an additional language (EAL), which may affect their ability to express concerns or understand safeguarding processes
- Are living in challenging circumstances, including temporary or insecure accommodation, relative poverty, or homes affected by domestic abuse, substance misuse, serious economic strain or other "toxic trio" factors
- Are at risk of specific forms of harm, including Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), forced marriage, radicalisation (including via online algorithms) or abuse involving AI-generated intimate images
- Are asylum seekers, refugees or unaccompanied minors who may have experienced trauma, displacement or loss
- Are at increased risk because of their own or a family member's significant mental health needs, self-harm or suicidal ideation
- Are looked after children (LAC), previously looked after children (PLAC), or children living in formal or informal kinship care arrangements (see Section 12)

- Are persistently absent from school, missing from education for periods of time, or displaying irregular attendance patterns that may indicate neglect or exploitation (Statutory guidance is included in Children Missing Education 2016, Working Together to Improve School's Attendance 2026)
- Have parents or carers who have requested, or expressed an intention, to electively home educate them, particularly where this coincides with unresolved attendance, behavioural or safeguarding concerns
- We also recognise that children who are suspended or permanently excluded may be vulnerable to a range of safeguarding concerns and that such actions can increase a child's risk of harm, exploitation, poor mental health, serious violence, criminal involvement, and becoming missing from education. The school will ensure that safeguarding remains central to all decision-making relating to suspensions and permanent exclusions. Staff will consider whether a child's behaviour may be an indicator of unmet safeguarding needs, abuse, neglect, exploitation, trauma, mental health concerns, family difficulties, or special educational needs and disabilities (SEND).

In line with the Equality Act 2010 and the Public Sector Equality Duty, we will take proportionate positive action, where appropriate, to address disadvantage, reduce barriers and improve outcomes for these and other vulnerable groups of pupils, while ensuring that all children benefit from a culture of safety, respect and inclusion.

Section 5 Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, including temporary staff, peripatetic teachers, volunteers, governors, contractors and visitors at Kingsholm C of E Primary School and Nursery, and is consistent with the local multi-agency arrangements of the Gloucestershire Safeguarding Children Partnership (GSCP). It also applies to any extended school provision and all off-site alternative provision (AP) activities.

All staff will read as a minimum:

- **Part 1** (Information for all staff) of the Department for Education's statutory safeguarding guidance, '*Keeping Children Safe in Education*' (KCSIE) 2026
- The **Part 1 Overview for all staff**
- **Part 5** (Child-on-Child Sexual Violence, Harassment, and Harmful Sexual Behaviour)
- **Annex A** (Specific Safeguarding Issues)

This reading will be refreshed at least annually and whenever there are updates to statutory guidance or local thresholds. Safeguarding training will also be updated at least annually.

The school plays a crucial role in preventative education within a whole-school approach, preparing pupils for life in modern Britain. We promote a strong culture of zero tolerance toward sexism, misogyny, misandry, homophobia, biphobia, transphobia, and all forms of sexual violence and harassment.

This culture is underpinned by and reflected in:

- Positive Behaviour for Learning Policy (including tracking of low-level and peer-on-peer concerns)
- Our pastoral support systems.
- A planned, inclusive programme of Relationships, Sex and Health Education (RSHE), which regularly addresses:
 - Healthy, respectful relationships, boundaries, and consent
 - Stereotyping, prejudice, equality, body confidence, and self-esteem
 - Recognising abusive relationships, including coercive control and teenage relationship abuse
 - The law around consent, sexual exploitation, grooming, harassment, rape, domestic abuse, so called honour-based abuse (Including forced marriage and FGM)
 - What constitutes online and offline sexual harassment and sexual violence, why these are always unacceptable, and how to access support

- The risks of digital harm, including making or sharing nudes or semi-nudes, and harassment or exploitation using AI-generated intimate media (deepfakes).

5.1 All Staff

All staff will:

- Read, understand, and implement **Part 1**, the *Part One Overview*, **Part 5**, and **Annex A** of *Keeping Children Safe in Education*, and confirm this annually in writing.
- Sign an Annual Criminal Declaration at the beginning of each academic year to identify whether they have been released under investigation, arrested, cautioned, convicted or reprimanded since completing their DBS/during the last academic year.
- Help to maintain a culture where pupils feel:
Safe, are listened to and know how to raise concerns.
Understand that all forms of abuse, harassment and discrimination are unacceptable.
- Reinforce online safety when communicating with parents and carers, clearly explaining school-sanctioned digital activities, and expectations.
- Maintain a supportive, safe culture for pupils who are LGBTQ+ or gender questioning, ensuring they feel able to speak out and receive child-centred support.
- Proactively challenge racist, sexist, homophobic, biphobic, transphobic and other discriminatory behaviour and language.

All staff will maintain an active, awareness of:

- **School Safeguarding Systems:** Including this policy, the Staff Code of Conduct, the identity and role of the DSL and Deputy DSLs, online safety risk assessments, (Including filtering and monitoring) and the specific response for pupils missing education or persistently absent.
- **Family Help/Early Help Pathways:** Understanding that early intervention supports children and families and knowing how to share information with the DSL/DDSL's to enable timely Family Help referrals under Gloucestershire arrangements. (Parental consent no longer required Sep 26)
- **Social Care Referrals:** The process for making a referral to Gloucestershire Children's Services and for contributing to Section 17 (Children in Need) and Section 47 (Child Protection) assessments.
- **Disclosure Management:** What to do if a child discloses abuse or neglect, including specific responses to issues such as FGM, CCE or radicalisation.
- **Contextual Safeguarding Threats:** Including child-on-child abuse, child sexual abuse (CSA), child criminal exploitation (CCE), county lines involvement, serious youth violence and online harms.
- **Trauma-Informed Victim Support:** Reassuring children that they are taken seriously, avoiding victim-blaming, and using sensitive terminology as advised by the DSL/DDSL's.
- **Overlapping Harms:** Recognising that children may face simultaneous harms at home, in school, in the community and online.
- **Low Level Concerns:** Allegations or concerns about colleagues and visitors must be reported directly to the Head Teacher who will follow guidance in *Keeping Children Safe in Education* (DfE 2026, Part four: Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors).

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. At Kingsholm C of E Primary School and Nursery, the DSL is:

Lucinda Field (Engagement and Relationship Manager).

The DSL has lead operational responsibility for safeguarding and child protection (Including online safety) across the school and nursery. During term time, the DSL (or a designated Deputy DSL) will be available on site or immediately contactable during school and nursery hours. Arrangements for out-of hours or holiday contact will be clearly communicated to staff and partner agencies.

The DSL will be given sufficient time, funding, training, supervision and resources to:

- Provide advice and support to staff on child protection matters.
- Take lead responsibility for early help and Family Help processes and for referrals to:
 - Gloucestershire Children's Social Care (AMSH/Front Door)
 - Police
 - Channel Panel
 - The Disclosure and Barring Service (DBS) when required
- Line manage and support the Operational Lead DDSL to lead, attend and contribute to multi-agency meetings, including:
 - Strategy discussions and Child Protection Conferences
 - Core Groups, Child In Need Meetings
 - Family Help/Team Around the Child Meetings
 - Maintain detailed, secure child protection records and oversee the transfer of files when pupils move settings
- Keep an up to date understanding of:
 - Child-on child abuse and harmful sexual behaviour
 - Online safety risks, including making or sharing nudes and semi-nudes and AI generated intimate media.
 - Local patterns of exploitation and vulnerability, particularly for children with SEND and complex needs.
- Oversee, with the IT/Digital Lead, the school's filtering and monitoring arrangements, ensuring they are:
 - Effective
 - Appropriate for the age and stage of pupils
 - Understood by staff (Including processes for overrides and responding to alerts)

The DSL will also:

- Keep the Headteacher regularly informed about safeguarding issues, trends and casework (While maintaining confidentiality where necessary)
- Liaise with the Local Authority Designated Officer (LADO Team) regarding allegations against staff, Trainee teachers, supply staff or volunteers. Where allegations concern a trainee teacher, the school will progress the matter with the LADO in the same way as for any other member of staff, while continuing to liaise with the initial teacher training (ITT) provider (KCSIE 2026, Part Four)
- Work closely with:
 - The **SENDCO** (Particularly regarding pupils with complex SEND/health issues)
 - The **Mental Health Lead**
 - Other **Safeguarding Partners** including health, police and voluntary agencies.
- Ensure that children involved in incidents of sexual violence or harassment (Both those who have been harmed and those who may have caused harm) receive, distinct, appropriate support and safety planning.
- Ensure that any child subject to a police search or police investigation on school premises has an **Appropriate Adult** present.
- If managing a critical incident involving a child, the DSL/Head will contact the Education Safeguarding Team on educationsafeguarding@gloucestershire.gov.uk. A critical incident may be defined as any sudden or unexpected incident or sequence of events which cause trauma within a school community, and which overwhelms the normal coping mechanisms of that school.

5.3 The Governing Body

The Governing Body has overall strategic responsibility for ensuring that the school and nursery fulfils its statutory duties to safeguard and promote the welfare of children.

The nominated Safeguarding and Child Protection Link Governor is **Bethan Morgan**. (Currently on Maternity Leave, in her absence this role will be undertaken by the Chair, **Sophie Kingscote**)

The Governing Board will:

- **Create and maintain a whole school culture of safeguarding**, where:
Safeguarding and child protection underpin all policies and practice.
Children's welfare and best interests are at the centre of decision making.
- **Review and approve this policy** at least annually and more frequently if needed, ensuring it reflects:
Current KCSIE and Working Together Guidance
GSCP procedures and thresholds
The specific context and risks at Kingsholm.
- **Statutory Obligations:** Ensure compliance with relevant legislation, including the:
Education Act 2002 (s175)
Human Rights Act 1998
Equality Act 2010 and the Public Sector Equality Duty (PSED)
Data Protection Act 2018 and UK GDPR
- **Strategic Oversight:** Appoint a senior board-level lead (Link Governor) for safeguarding who is not the DSL and not part of the operational safeguarding team.
- **Website:** Oversee school website, ensure safeguarding is communicated effectively on it.
- **Training and Professional Development:** Ensure all governors receive appropriate training on:
Safeguarding and child protection.
Their strategic role under KCSIE and Working Together
Online safety, filtering and monitoring and data protection.
- **Oversee the school and nursery's filtering and monitoring arrangements**, ensuring that:
They meet the DfE's filtering and, monitoring standards
Risks arising from emerging technologies, including generative AI and deepfakes, are reviewed regularly.
There is a clearly documented annual audit of digital safeguarding arrangements.
- **Resource Allocation:** Ensure the DSL has sufficient time, authority and resources, including access to appropriate supervision, to fulfil their role effectively.
- **Low-Level Concerns Framework:** Oversee robust procedures for:
Safer Recruitment
Managing Allegations against staff, supply staff, peripatetic staff, contractors and volunteers (harm threshold)
Low-level concerns about adult conduct (below the harm threshold)
- **Vulnerability Tracking:** Ensure all systems recognise and prioritise the additional vulnerability of pupils who have:
SEND, including complex SEND
Are neurodivergent or have complex medical needs
Face communication barriers or rely on alternative/augmentative communication.
- **Alternative Provision (AP) and Third-Party Oversight:** Retain oversight of any use of alternative provision (AP) or external providers, ensuring that:
Safeguarding responsibilities remain with Kingsholm for any pupil on roll.
Written confirmation of safer recruitment checks is obtained from providers.
Any safeguarding incidents or changes in staff are reported to the school and nursery.
Compliance with this policy is a condition of any premises hire or service level agreement.
- **Martyn's Law (Premises Protection):** Ensure the school meets its statutory security duties by maintaining proportionate, regularly tested procedures for **evacuation, invacuation, and emergency lockdown**, and officially designating a site "Responsible Person" to oversee terrorism risk mitigation. (School site responsible person is Helen Howe, Business & Operational Manager)
- **Allegations Against Leadership:** If an allegation is made against the Head Teacher, the Chair of Governors will act as case manager and liaise directly with the LADO. If the allegation is made against the Chair of Governors, the Vice Chair or another nominated governor will liaise with the LADO.

Governor Reading Expectations

- **The Chair of Governors and the Safeguarding Link Governor** will read *Keeping Children Safe in Education 2026* in full.

- **The Vice Chair of Governors** will read KCSIE in full, with specific focus on **Part 4** (Managing Allegations Against Staff and Volunteers).
- **All Other Governors** will read **Part 1** (*Information for All Staff*), **Part 2** (*The Management of Safeguarding*), and **Part 5** (*Child-on-Child Sexual Violence and Harassment*), and be familiar with the structure and purpose of the remaining parts/annexes.

Section 16 of this policy explains how governors are supported to fulfil their role.

5.4 The Headteacher

The Headteacher has overall operational responsibility for ensuring this policy is implemented consistently and that safeguarding systems are effective.

The Headteacher will ensure that:

Induction for all staff (including supply, temporary and contract staff) and volunteers includes:

This Safeguarding and Child Protection Policy

The Staff Code of Conduct

Part 1, Part 1 Overview, Part 5 and Annex B of KCSIE

Identity the role of the DSL and Deputy DSLs

How to report concerns and use CPOMS

All staff understand and follow the procedures in this policy, with emphasis on:

Prompt reporting and recording of all concerns

Immediate escalation where significant harm or immediate danger is suspected

This policy is shared with parents and carers when their child joins the school, is available on the school website, and is highlighted at key transition points.

The DSL and Deputy DSLs have:

Adequate time in their job plans

Access to training, supervision and resources

Physical access to confidential working space when needed

An appropriately trained DSL or deputy is on site or immediately available at all times when the school and nursery are open to pupils.

Allegations or concerns about staff, supply staff and volunteers are managed in line with Part 4 of KCSIE 2026 and Appendix 2 of this policy, including liaison with the LADO.

Systems for reporting and managing low-level concerns about staff conduct are embedded and monitored.

EYFS statutory requirements are met, including:

Appropriate staff-to-child ratios

Each EYFS child having an identified Key Person

The safe use of technology, mobile phones, smartwatches and cameras is monitored and controlled in accordance with the Online Safety Policy.

The school actively engages with GSCP arrangements, including:

Family Help / early help pathways

Threshold guidance

Local escalation procedures

Emergency preparedness (e.g. evacuation, invacuation and lockdown) is in place and tested; the site responsible person for premises security and Martyn's Law related duties is Helen Howe – Business & Operational Manager.

5.5 Visitors/Volunteers

All visitors complete a signing in/out process, wear a school ID badge and are provided with key safeguarding information including the contact details of safeguarding personnel in school.

Scheduled visitors in a professional role (e.g. fire officer, police, LA staff) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at school. Careful consideration is given to the suitability of any external organisations. Professionals may also be required to provide a letter of assurance from their organisation that safer recruitment checks have been completed.

If the visit is unscheduled and the visitor is unknown to the school, we will contact the relevant organisation to verify the individual's identity and confirm the reason for the visit.

An enhanced DBS with barred list check will be completed for all volunteers taking part in regulated activity in line with The Crime and Policing act 2026.

Section 6: Information Sharing, Data Protection and Confidentiality

Effective safeguarding depends on timely, appropriate information sharing. Kingsholm C of E Primary School and Nursery will not allow concerns about data protection to stand in the way of safeguarding a child.

6.1 Core principles

- **Child safety comes first:** The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information to safeguard children. We rely on lawful bases such as Public Task and Legal Obligation for most safeguarding related processing. The latest Government advice (Sep 26) is given in 'Information Sharing Duty Statutory guidance for safeguarding organisations and their practitioners (September 26) <https://www.gov.uk/government/consultations/information-sharing-duty-statutory-guidance>, consent to share is no longer needed.
- **No secrets:** Staff must never promise a child that they will keep a disclosure secret. They will explain that information may need to be shared with the DSL and others who can help keep them safe.
- **Need-to-know:** Information will be shared internally and with other agencies only when necessary to safeguard a child, provide effective support, or comply with statutory duties.
- **Secure records:** All child protection concerns, including low-level indicators and patterns of behaviour, are recorded on CPOMS. These records:
 - Are kept securely
 - Are separate from the main pupil file
 - Are accessible only to those who need to know
- **Transfer of records:** When a child moves to another school or setting (including AP), the child protection file will be transferred securely and directly to the new setting's DSL as soon as possible, and a receipt will be obtained.

6.2 Multi-agency working and parental communication

- We will usually seek to discuss concerns with parents/carers before making a referral to Children's Social Care, unless doing so:
 - Would place the child at increased risk of harm
 - Could compromise a police investigation
 - Is not in the child's best interests (as assessed by the DSL)

However, parental consent requirement changed in Sep 26, requirement is now that practitioners should identify their lawful basis for sharing information first, then explain what will happen

- If a child is subject to a Child Protection Plan, is a looked after child (LAC), previously looked-after child (PLAC), or is on an active Family Help plan, and is absent without explanation, the school will:
 - Take immediate steps to check on their welfare
 - Inform their allocated social worker or Family Help worker on the same day
- The school will cooperate fully with section 17 and section 47 enquiries, attending and contributing to:
 - Strategy meetings
 - Child Protection Conferences
 - Core groups and Child in Need meetings
 - Family Help / early help multi-agency meetings
- The leadership team and the Data Protection Officer (DPO) will regularly review DfE guidance on data protection for schools and the statutory advice on Information sharing for safeguarding practitioners, ensuring our policies are updated and staff are trained.

September 26: Information sharing is now a legal duty; the new guidance requires practitioners to share information about safeguarding and promoting a child's welfare. If any member of staff is unsure whether to share information, they must consult the DSL or a Deputy DSL's immediately.

Section 7: Recognising Abuse and Acting Upon It

All staff must be able to identify signs of abuse, neglect and exploitation and know what to do if they are worried about a child. Staff must always act on the assumption that "it could happen here".

Staff should be particularly alert to children who may benefit from Family Help / early help or statutory intervention, including children who:

- Are disabled, neurodivergent or have complex medical / physical health conditions
- Have SEND (irrespective of whether they have an EHC plan)
- Are young carers
- Have experienced recent bereavement or trauma
- Are being drawn into anti-social or criminal behaviour, including gang involvement, county lines or serious youth violence
- Are frequently missing from home, care or education
- May be at risk of modern slavery, trafficking, CSE or CCE
- May be at risk of radicalisation or exposure to extremist material (including via online algorithms and AI tools)
- Are experiencing online harms, including exposure to harmful content, grooming or AI-generated intimate media
- Are living in families experiencing domestic abuse, substance misuse or significant mental ill health
- Are personally misusing drugs or alcohol
- Show indicators of mental ill health, self harm, eating disorders or suicidal ideation
- Have recently returned home from local authority care
- Are in informal or formal kinship care or private fostering arrangements
- Have a parent/carer in prison or involved in the criminal justice system
- Are at risk of so-called honour based abuse, including FGM or forced marriage
- Are persistently absent, missing from education or at risk of exclusion

Staff, volunteers and governors must follow the procedures below. "DSL" should be taken to mean the DSL or any Deputy DSL.

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

If you believe a child is suffering, or likely to suffer significant harm, or is in immediate danger:

- Act immediately.
- Make an urgent referral to:
Gloucestershire MASH / Front Door (01452 426565) and/or
Police on 999 if there is immediate risk to life or serious crime taking place.
Inform the DSL as soon as possible after making the referral and record the actions taken on CPOMS.
- Anyone can make a referral to Children's Social Care.

7.2 If a child makes a disclosure to you

If a child discloses abuse or neglect:

- Listen carefully and allow them to speak in their own words; do not ask leading questions.
- Stay calm; do not show shock, anger or disbelief.
- Reassure the child that they have done the right thing in speaking up.
- Do not promise confidentiality; explain you will need to tell the DSL so that they can help keep them safe.
- Do not investigate or examine injuries.
- Record what was said as soon as possible on CPOMS:
Use the child's own words wherever possible

Stick to facts, not opinions

Include date, time, location and your name

- Submit the CPOMS record on the same day and make sure the DSL knows about the disclosure.

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

FGM is a form of child abuse and violence against women and girls. It is illegal in the UK.

Mandatory reporting duty for teachers

Under section 5B of the FGM Act 2003 (as amended), if in the course of their work a teacher:

- Is told by a girl under 18 that FGM has been carried out on her; or
- Observes physical signs which appear to show that FGM has been carried out,

they must:

1. Make a personal report to the police via 101 as soon as possible and within 24 hours.
2. Immediately inform the DSL and record the incident on CPOMS.

Failure to comply with this duty may lead to disciplinary action and referral to the Teaching Regulation Agency.

All other staff and risk of FGM

- The mandatory duty applies to teachers only.
- Any other member of staff who discovers that FGM has been carried out must:
 - Inform the DSL immediately and record on CPOMS the same day.
- If you suspect that a girl is at risk of FGM (for example, in relation to planned travel or family/community pressure), you must:
 - Inform the DSL immediately and record your concerns on CPOMS.
 - Not examine the child.
- The DSL will decide whether to:
 - Make an immediate referral to MASH / Children's Social Care, and/or
 - Seek advice from the police, health or specialist services.

Further indicators and risk factors are included in Appendix 1 / Appendix 3 (ensure cross-reference matches your final structure).

7.4 If you have welfare concerns about a child (low-level or emerging risks)

Where you have a concern about a child's welfare that does not appear to meet the threshold of "significant harm":

- Do not delay.
- Record the concern on CPOMS before you leave school that day.
- Speak to the DSL (or a deputy).

If the DSL/deputy is not available and you are worried about the child's safety, speak to a senior leader and/or seek advice directly from MASH / Children's Social Care. You may also contact the NSPCC helpline (0800 800 5000) for advice; any such contact must also be logged on CPOMS and shared with the DSL.

Family Help (Early Help) assessment

If the DSL decides that a Family Help / early help assessment is appropriate:

- The DSL will coordinate with relevant professionals to put together an inter-agency plan.
- School staff are expected to cooperate and, where appropriate, may act as the Lead Practitioner.
- The DSL will keep all open early help plans under review and will escalate to Children's Social Care (Section 17 or Section 47 referral) if:
 - The child's situation does not improve
 - Risks escalate or new concerns emerge

Health information and legal data sharing

- The SENDCo (currently Michelle Ginn) is the school lead for coordinating complex health needs and liaising with health professionals.
- Staff should be aware that explicit parental consent is not required to share information where a child's safety or welfare is at stake; lawful bases such as Public Task, Legal Obligation and Statutory advice (Sep 26) apply.

Statutory referrals and escalation

- When a referral to Children's Social Care or the police is needed, the DSL will usually make this referral or support the member of staff to do so.
- Children's Social Care should decide on their response within 1 working day of a referral and inform the referrer of the outcome.
- If no decision or feedback is received, the DSL (or referrer) must chase MASH and record the outcome on CPOMS.
- If the DSL disagrees with a decision or feels that a child is not receiving adequate support, they will use the GSCP Escalation Procedure to challenge and resolve the issue.

7.5 If you have concerns about radicalisation or extremism

If you are concerned that a pupil may be vulnerable to radicalisation:

- Speak to the DSL as soon as possible.
- If the DSL is unavailable, speak to a senior leader or contact Children's Social Care for advice.

The DSL will:

- Assess the indicators, including online activity, associations and any use of AI tools to spread extremist content.
- Decide whether to:
 - Refer to Children's Social Care
 - Make a Channel referral (through local procedures)
 - Contact the police where an immediate risk of harm or crime is suspected.

For non-emergency advice, the DfE counter-extremism helpline (020 7340 7264) is available. In an emergency, staff must dial 999 or contact the anti-terrorist hotline (0800 789 321), then inform the DSL.

7.6 Mental health and acute vulnerabilities

Mental health issues can be both a cause and a consequence of abuse, neglect and exploitation. All staff should understand that:

- Changes in mental health may be indicators of underlying safeguarding concerns.
 - A child expressing self harm or suicidal thoughts must be taken seriously and responded to promptly.
1. Identifying risk indicators

Staff should be alert to:

- Sudden mood changes, social withdrawal or extreme emotional reactions
 - Noticeable changes in eating, sleeping or self care
 - Reduced engagement in learning, poor concentration or deterioration in attendance
 - Signs of self harm or disclosure of suicidal ideation
2. When mental health concerns are also safeguarding concerns

If you have a mental health concern that is also a safeguarding concern (e.g. self harm, suicidal thoughts, suspected abuse or exploitation):

- Follow the procedures in Section 7.1 or 7.4 as appropriate.
 - Record the concern on CPOMS on the same day.
 - If you believe the child is in immediate danger of serious self harm or suicide, call 999 for an ambulance and inform the DSL and Headteacher immediately.
3. Managing mental health concerns that are not currently safeguarding concerns

If your concern appears to be primarily about mental health, with no immediate safeguarding indicators:

- Log the concern on CPOMS within 24 hours.
- Speak with the DSL or Mental Health Lead to agree next steps, which may include:
 - Pastoral support
 - Involvement of the SENDCo
 - Involvement of parents/carers
 - Referral to external services such as CAMHS or NHS 111, or Family Help pathways

7.7 Allegations about a staff member, supply teacher, volunteer or contractor

Kingsholm C of E Primary School and Nursery operates a zero tolerance approach to any adult behaviour that harms or may harm children.

We distinguish between:

- **Harm threshold allegations** – where a person working with children may have:
 - 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 they may pose a risk of harm
- Behaved in a way that indicates they may not be suitable to work with children (including behaviour outside school)
- **Low-level concerns** – see 7.7.3 below and Appendix 2

Reporting harm threshold allegations

If you have any such concern or receive an allegation about a member of staff, supply staff, volunteer or contractor, you must:

- Report it immediately to the Headteacher, verbally and in writing.
- Not investigate the matter yourself.

Allegations against the Headteacher or conflicts of interest

- If the allegation concerns the Headteacher, report directly to the Chair of Governors.
- If you believe there is a conflict of interest in reporting to the Headteacher or Chair, or feel your concern has not been properly addressed, you must report directly to the LADO.

Low-level concerns

A low-level concern is any behaviour by a member of staff, supply staff, volunteer or contractor that:

- Is inconsistent with the Staff Code of Conduct, and/or
- Does not meet the harm threshold above, but may indicate a pattern of concerning, questionable or inappropriate behaviour.

All low-level concerns must be:

- Reported to the Headteacher the same day
- Recorded and reviewed to identify patterns or escalation

Further detail is provided in Appendix 2.

Third-party users of the premises and supply/agency staff

- Where an allegation relates to activities run on the school site by a third party (e.g. holiday clubs, sports groups), the school will:
 - Follow local safeguarding procedures and report to the LADO as appropriate
 - Inform the organisation's management
 - Consider suspending or terminating the hire agreement if safeguarding concerns are not dealt with appropriately
- Where an allegation concerns a supply teacher or contractor, the school will:
 - Treat the concern in the same way as for its own staff
 - Work with the supply agency/contractor and the LADO
 - Not cease using the individual simply to avoid addressing the allegation

Regulatory notifications

- The school will notify Ofsted of any serious safeguarding incident or allegation that meets regulatory thresholds within the required timeframes.
- Where a person is dismissed or would have been dismissed due to harm to a child, the school will make a referral to the DBS.

7.8 Allegations of abuse made against other pupils (child-on-child abuse)

Kingsholm C of E Primary School and Nursery adopts a zero-tolerance approach to all forms of child-on-child abuse, including bullying, harassment and violence. Such behaviour will never be accepted, condoned or dismissed as “banter”, “just having a laugh” or “part of growing up”. Minimising or normalising these behaviours risks creating a culture in which children feel unsafe and are less likely to report concerns.

We recognise that child-on-child abuse often has a gendered pattern, with girls more frequently the targets of sexual harassment and sexual violence, and boys often subject to pressure to conform to harmful norms. However, all forms of child-on-child abuse is unacceptable and will be taken seriously regardless of the sex of those involved. (KCSIE 2026 para 191), regardless of the sex, gender, or any other protected characteristic of the children involved. Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, who may themselves need support; it is preventable, and staff have a responsibility to report any concerns to the DSL regardless of whether the incident happened on or off site.

Sexual harassment and violence between children can be linked to wider cultures of misogyny; **Kingsholm C of E Primary School and Nursery** will consider this link when planning its curriculum and pastoral response.

Day-to-day disagreements and low-level conflict between pupils will usually be managed under the school’s Behaviour Policy. However, where an incident or allegation raises safeguarding concerns, the Safeguarding and Child Protection Policy takes precedence. This includes, but is not limited to, situations where the behaviour:

- Is serious in nature or may constitute a criminal offence
- Presents an ongoing or unmitigated risk to one or more pupils
- Bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Involves physical assault and harm, or the threat of harm with a weapon
- Involves coercion, force or pressure relating to alcohol or illegal substances
- Involves Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) or other forms of exploitation (including trafficking or modern slavery)
- Involves any form of harmful sexual behaviour, sexual violence and sexual harassment, which may include misogyny/misandry consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI (Such as deepfakes)
- 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.
- Causing someone to engage in sexual activity without consent
- Initiation/hazing type violence and rituals.

Procedures for managing allegations of child-on-child abuse

If a pupil makes an allegation of abuse by another pupil, or a member of staff otherwise becomes aware of potential child-on-child abuse, the following steps must be taken:

1. Immediate response and recording

- The member of staff must listen carefully, reassure the child that they are being taken seriously, and avoid asking leading questions or investigating the allegations.

- The disclosure or concern must be recorded factually on CPOMS on the same working day, using the child's own words where possible.
- The concern must be reported to the Designated Safeguarding Lead (DSL), or a deputy DSL, without delay. Staff must not undertake their own investigation or speak to other pupils beyond what is necessary to safeguard a child in immediate danger.

2. DSL assessment and decision-making

The DSL (or deputy) will:

- Review the information immediately and consider the nature, seriousness and context of the allegation, including any power imbalance, coercion, age or developmental differences, or additional vulnerabilities.
- Where a crime may have been committed, or a child may be at risk of significant harm, make a referral without delay to Gloucestershire's children's social care (MASH) and/or the police, in line with local safeguarding procedures.
- Take advice from children's social care and/or the police about how and when to inform parents/carers of the children involved, and about any further enquiries by the school.

3. Risk assessments and safety planning

In line with KCSIE 2026 and Working Together to Safeguard Children (2026), the DSL/DDSL's will recognise that child-on-child abuse is a safeguarding concern for all children involved: the child who has been harmed, the child alleged to have caused harm, and any witnesses.

The DSL/DDSL will:

- Complete individual, written risk assessments for each child involved, considering their needs, wishes and vulnerabilities.
- Put in place proportionate, child-centred safety and support plans, which may include:
 - Supervision arrangements and adjustments to timetables, class groups or access to certain areas of the school site
 - Named trusted adults for each child
 - Pastoral support, including access to counselling or mental health support where appropriate
 - Measures to prevent further contact or retaliation, where necessary and feasible
- Keep risk assessments under regular review and adjust plans as circumstances change.

4. Support, early help and multi-agency working

- The DSL may initiate or contribute to an early help (Family Help) assessment where needs do not meet the threshold for statutory children's social care intervention, but additional support is required.
- Where there is evidence of trauma, self-harm, acute distress or other mental health needs, the DSL will consider referral to appropriate health or mental health services, in line with local referral pathways.
- The school will cooperate fully with any social care or police investigations and will take advice about how school-based enquiries and disciplinary processes should proceed to avoid prejudicing those investigations.

5. School behavioural processes

- A live police or social care investigation does not remove the school's responsibility to safeguard and support pupils.
- Subject to advice from the police and children's social care, the school may implement its own behaviour procedures in parallel with, or following, external investigations, provided these do not compromise those processes.
- Decisions about sanctions (including possible fixed-term or permanent exclusion) will consider the age and needs of the children involved, the nature and impact of the incident, and any underlying safeguarding concerns affecting the child alleged to have caused harm.

Preventing child-on-child abuse and promoting a safe reporting culture

To reduce the risk of child-on-child abuse and encourage early reporting, the school will:

- Challenge harmful language and attitudes: Staff will challenge all inappropriate, derogatory or discriminatory language (including sexist, racist, homophobic, biphobic, transphobic or ableist

language) and record serious or repeated incidents as safeguarding or behaviour concerns, as appropriate.

- Maintain vigilance about gendered and other patterns of harm: Staff will be alert to behaviours such as unwanted or intrusive physical contact, sexualised comments or “jokes”, group-based targeting, initiation rituals or hazing.
- Provide preventative education: Through our RSHE, Computing and wider curriculum, we will teach pupils about respectful relationships, consent, body autonomy, online safety, digital citizenship and how to recognise and report abuse, including online sexual harassment and the sharing of nudes and semi-nudes, racism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.
- Monitor patterns and locations of concern: The DSL will review safeguarding records (e.g. CPOMS) to identify emerging trends, locations or groups of pupils of concern and will work with senior leaders to address these, including through supervision arrangements, environmental changes and policy updates.
- Support witnesses and families: The school will ensure that child witnesses and siblings of those involved receive appropriate pastoral support and are protected from retaliation or bullying.
- Address online and out-of-school risks: The DSL will consider how incidents extend beyond school premises and hours, including on social media and messaging platforms, and will factor this into risk assessments, safety plans and the school's work with parents and carers.

Staff awareness and training

All staff, volunteers and governors are expected to maintain an “it could happen here” mindset. Training will ensure that staff:

- Understand that children may not directly disclose abuse by peers, and may instead show changes in behaviour, attendance, friendships or mood, or disclose indirectly through a friend.
- Recognise that a child who harms another child may also be a victim of abuse, neglect or exploitation and requires safeguarding support.
- Know that the DSL is responsible for coordinating the safeguarding response to child-on-child abuse, including balancing behaviour management with protection and support for all children involved.

Further detailed guidance on managing child-on-child abuse is available in DfE guidance and KCSIE 2026.

7.9 Sharing of nudes and semi-nudes (including AI-generated intimate images)

Kingsholm C of E Primary School and Nursery treats all incidents involving the creation, possession or sharing of nudes and semi-nudes (sometimes referred to as “youth-produced sexual imagery”) as safeguarding concerns. This includes:

- Self-generated intimate images: Nude or semi-nude images, videos or live streams created by a child or young person and shared consensually or non-consensually.
- AI-generated or digitally manipulated intimate images (“deepfakes”): Images or videos that are wholly computer-generated, synthetically altered or digitally manipulated to depict a child, or that appear to do so, including where a child's face has been superimposed onto another image.

The school will follow KCSIE 2026, relevant DfE guidance on “Sharing nudes and semi-nudes”, national policing guidance and local multi-agency procedures.

Staff responsibilities on becoming aware of an incident

If a member of staff becomes aware of, or is shown, an incident involving possible sharing of nudes or semi-nudes (including AI-generated intimate images), they must:

- Inform the DSL, or a deputy DSL, immediately.
- Record the concern factually on CPOMS on the same working day.

To avoid committing a criminal offence or exacerbating harm, staff must not:

- View, copy, print, share, store, save or screenshot the imagery, or ask a pupil to share or download it. If imagery has been viewed accidentally, the staff member must close it immediately and inform the DSL.
- Delete the imagery, or ask a pupil to delete it, as this may destroy evidence.
- Question pupils for detailed descriptions of the imagery or cross-examine them. Basic, non-leading clarification questions may be asked only where necessary to establish whether a child is at immediate risk, but any further enquiry is the responsibility of the DSL.
- Discuss the incident with other staff, pupils or parents/carers, except where authorised by the DSL.
- Blame, shame or stigmatise any child involved.

The staff member must explain to the pupil(s) that the information will be passed to the safeguarding team and reassure them that the school will support and protect them.

Initial review by the DSL

Following a report, the DSL (or deputy) will hold an initial review discussion with relevant senior staff (and, where appropriate, the reporting member of staff). This will consider:

- Any immediate risk of harm to any child (physical, emotional, online or reputational).
- Whether there are grounds for an immediate referral to children's social care (MASH) and/or the police.
- Whether it is strictly necessary for the DSL to view the imagery to safeguard a child. In most cases, school staff should not view imagery; decisions will be based on information from the child(ren), parents/carers, and/or technical logs.
- The apparent nature and extent of the imagery, including whether it has been widely shared or is contained within a small group.
- The ages and developmental stages of the children involved, and any known vulnerabilities (e.g. SEND, mental health, social care involvement).
- Whether other agencies, such as another school or alternative provision, need to be informed.
- Whether parents/carers should be informed at this stage. In most cases, parents/carers will be informed as early as possible, unless doing so could place a child at greater risk.

Mandatory referrals to the police and children's social care

The DSL/DDSL will make an immediate referral to the police and children's social care where:

- An adult is involved in creating, possessing or sharing the imagery.
- There is reason to believe that a child has been coerced, blackmailed (including financial sextortion) or groomed, or that their ability to consent is impaired (for example, due to age, SEND, neurodivergence, intoxication, or other vulnerabilities).
- The imagery appears to show sexual acts that are violent, degrading, exploitative, or otherwise inappropriate for the child's developmental stage.
- The imagery involves any sexual activity and a child depicted appears to be under 13 years of age.
- There are immediate concerns for a child's safety, such as evidence of severe emotional distress, self-harm or suicidal thoughts linked to the incident.

Where these thresholds are met, the DSL will contact the police (via 101, or 999 in an emergency) and children's social care (MASH) without delay and follow their advice. These referrals will be recorded on CPOMS.

Responding where statutory thresholds are not met

Where the initial review indicates that the above thresholds are not met, the DSL, in consultation with the Headteacher (and other agencies as appropriate), may decide that it is suitable to manage the incident within the school's safeguarding, behaviour and pastoral systems. In such cases, the DSL will:

- Record the decision and the rationale clearly on CPOMS.

- Complete a risk assessment for each child involved and put in place proportionate support and safety measures.
- Consider early help, targeted support or referral to external services where appropriate.
- Consider appropriate disciplinary action in line with the Behaviour Policy, including in relation to bullying, harassment or misuse of technology.

Further enquiries by the DSL

If no immediate referral is made at the initial review stage, the DSL will:

- Gather further information from the children involved, using a calm, supportive and trauma-informed approach.
- Continue to assess risk and, if at any point concerns arise that a child has been harmed or is at risk of harm, make a referral to children's social care and/or the police immediately.

Informing parents and carers

- Parents/carers of the children involved will normally be informed as soon as reasonably possible, unless there is a clear and recorded reason to believe that this would place a child at greater risk of harm (for example, where there are concerns about honour-based abuse, forced marriage, or domestic abuse).
- The DSL will provide parents/carers with information on how the school and other agencies are responding and what support is available.

Recording

All incidents involving the sharing of nudes or semi-nudes, including AI-generated intimate images, will be:

- Recorded in detail on CPOMS on the same working day, including the context, decisions taken, referrals made, and any safety planning.
- Stored securely with restricted access, in line with data protection and child protection record-keeping requirements (see Section 14).

Preventative education

Through RSHE, Computing and wider curriculum provision, the school will:

- Explain what nudes and semi-nudes are, including AI-generated and digitally manipulated images, and how children may encounter them online.
- Teach pupils about the legal, emotional and social consequences of creating, requesting, sharing or possessing such images.
- Address online sexual harassment, coercion, peer pressure, "sextortion" and image-based abuse, including the role of social media and group chats.
- Promote strategies for resisting and responding to pressure to share images, and for seeking help if they receive such images or are worried about their online reputation.
- Reinforce key messages around consent, privacy, digital footprint and respect for others.

Teaching will be age appropriate, inclusive and sensitive to pupils' needs. It will avoid scare-mongering or victim-blaming and will emphasise that the responsibility for the abuse always lies with those who coerce, exploit or harm others.

7.10 Trauma-informed reporting systems for pupils

Kingsholm C of E Primary School and Nursery is committed to providing a safe, child centred environment in which pupils feel heard, respected and able to report concerns about their own safety or the safety of others.

1. Listening to and acting on the voice of the child

- Wishes and feelings: When a safeguarding or child protection concern is identified, staff will seek and record the child's wishes, feelings and views about what has happened and what support they feel they need, in a way that is appropriate to their age and understanding.
- Informing and involving children: While we cannot promise confidentiality and must act to protect children from harm, staff will explain clearly what will happen next, who will be told, and why. Wherever possible, we will involve children in decisions about their safety plans and support, while ensuring that their best interests and safety remain paramount.

2. Accessible and varied reporting routes

To reduce barriers to disclosure, including fear, shame, communication difficulties or digital intimidation, the school will:

- Provide multiple reporting options: Offer a range of ways for children to share concerns, including speaking directly to a trusted adult, using "worry boxes" or similar written tools.
- Promote and explain reporting systems: Ensure that pupils know how to use these routes, who they can talk to, and what will happen when they do. This will be reinforced regularly through assemblies, classroom discussions, displays and termly teacher led reminders.
- Ensure accessibility: Make reasonable adjustments so that reporting routes are accessible to all pupils, including those with SEND, neurodivergent profiles or English as an Additional Language. This may include the use of visual supports, communication aids, interpreters or translated materials.

Staff will be supported and trained to build safe, trusting professional relationships with pupils, so that children know there are adults in school they can approach if they feel worried, unsafe or unhappy.

3. Reassurance, validation and feedback

The school will:

- Provide immediate reassurance: Make it clear to pupils that they will be listened to, taken seriously and treated with respect. Staff will avoid expressing shock or disbelief and will not blame or judge the child.
- Challenge victim-blaming: Ensure that staff understand, through training, how to avoid victim-blaming language or attitudes, especially in cases of child-on-child sexual harassment, online abuse or the sharing of nudes and semi-nudes.
- Provide age-appropriate feedback: Where appropriate, and in line with confidentiality and data protection requirements, pupils will be given feedback about how their concerns have been addressed and how their safety is being supported.
- Seek pupil views: Use age-appropriate methods (such as pupil voice groups, surveys or informal discussions) to gather children's views on how safe they feel in school, how confident they are to report concerns, and how well the school responds, and to inform ongoing improvement of our safeguarding culture and RSHE curriculum.

All staff are expected to uphold these principles and to work in a trauma-informed and child-centred way.

Section 8	Online Safety, Artificial Intelligence (AI), and Mobile Technology
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Kingsholm C of E Primary School and Nursery recognises that the safeguarding, data protection and intellectual property considerations arising from the use of Generative AI (whether teacher-facing or pupil-facing) in education. Technology, social media and generative artificial intelligence intersect with many areas of child welfare, child-on-child abuse and exploitation.

Staff will have regard to the Department for Education's guidance on [Generative artificial intelligence in education](#), and to related sector resources on identifying and mitigating the associated safeguarding risks, when considering the use of AI tools in the setting (KCSIE 2026, paras 165-166). Staff should also be aware that images or videos of a sexual nature generated using AI are treated in the same way as other nudes and semi-nudes for safeguarding purposes

We will:

- Maintain robust, compliant filtering and monitoring systems across all school networks, in line with the DfE Filtering and Monitoring Standards for Schools and Colleges and the DfE digital and technology standards
- Protect and educate pupils, staff and parents on the safe, ethical and responsible use of digital technology, including mobile devices, smart watches and AI applications
- Enforce clear guidelines on the use of personal and school-issued devices
- Use CPOMS to identify, record and escalate online safety incidents on the same working day

8.1 The four categories of online risk

Our approach is based on the four recognised areas of risk, with additional focus on AI-related harms:

1. **Content** – exposure to illegal, inappropriate or harmful material, including:
 - a. Pornography, violent or extremist content, racism, misogyny or misandry
 - b. Content promoting self-harm or suicide
 - c. Misinformation or disinformation, including harmful content generated by public AI tools
2. **Contact** – being subjected to harmful online interaction, including:
 - a. Online grooming, including adults posing as children
 - b. Peer-on-peer harassment, intimidation or coercion
 - c. Algorithmic radicalisation and commercial manipulation
 - d. Financial exploitation, including "financial sextortion"
3. **Conduct** – online behaviour by the child that increases their own or others' risk, including:
 - a. Cyberbullying or hate speech
 - b. Sharing of personal information
 - c. Creating, possessing or distributing self-generated intimate images or AI-generated intimate media (e.g. deepfakes)
4. **Commerce** – risks from online commercial activity, including:
 - a. Online gambling, scams and fraud
 - b. Age-inappropriate advertising
 - c. Unauthorised in-app purchases and data harvesting

Where we identify significant commercial or cyber-security risks, these will be escalated to our IT provider and, where appropriate, to local police / cyber-crime partners.

8.2 How we implement online safety

1. Curriculum and preventative education

We will:

- Deliver a regular, age-appropriate online safety curriculum through RSHE and Computing
- Teach pupils to:
 - Protect personal information and privacy
 - Recognise manipulation, grooming and pressure (including via algorithms and AI chatbots)
 - Understand what constitutes cyberbullying and image-based abuse
 - Know how and where to seek help if they are worried about anything online
- Provide parents/carers with:
 - Up-to-date online safety information and signposting
 - Clear information about the platforms or apps we use for learning
 - Advice on how to manage devices and parental controls at home

2. Governance, filtering and monitoring

The Governing Body, DSL team and Digital/IT Lead share responsibility for network safety. The school will:

- Complete and record an annual filtering and monitoring audit
- Review filters and monitoring logs regularly for:
 - Searches or access attempts related to radicalisation, self-harm, pornography or other high-risk content
- Ensure staff understand:
 - How filtering and monitoring work in practice
 - How to respond to alerts or attempts to bypass systems

3. Staff development and AI boundaries

All staff, volunteers and governors will receive online safety training at induction and at least annually. This includes:

- Understanding the four categories of risk
- Knowing how to respond to online disclosures and incidents
- Their responsibilities when using school IT systems and responding to alerts

Generative AI and data protection

Staff must:

- Not enter identifiable pupil information, photographs, audio or safeguarding content into external AI tools (e.g. ChatGPT, Copilot, Gemini)
- Only use AI tools that have been approved by the school and are covered by a risk assessment / DPIA
- Follow the school's Data Protection Policy at all times

4. Mobile technology and cameras

- **Staff may bring personal mobile phones** and smart devices into school but must only use them:
 - During non-contact time
 - In staff-only areas, away from pupils
- **Staff must not use personal devices to photograph, video or audio-record pupils.** All images or recordings of pupils must be taken on school-owned devices in line with our Photo and Video Policy. Any breaches of this will be addressed through school staff conduct and disciplinary procedures.
- **Pupils' use of mobile phones** and smart devices is governed by our Mobile Phone / Acceptable Use rules; breaches are managed under the Behaviour Policy.
- **All staff, volunteers, governors, parents and pupils** using school systems must sign and follow Acceptable Use Agreements.

5. Searching, screening and confiscation

In line with DfE guidance on Searching, Screening and Confiscation:

- Authorised staff may search a pupil's phone or device where there are reasonable grounds to suspect it contains prohibited material or relates to a serious breach of school rules
- If a device is found to contain intimate images or videos (including AI-generated deepfakes):
 - Staff must not view, copy, download or share the content
 - The device will be confiscated and passed immediately to the DSL
 - The DSL will manage containment, coordinate any police referral, and support image takedown where possible

For full detail, see our separate Online Safety Policy and Mobile Phone Policy.

8.3 Artificial Intelligence (AI) and generative technology risks

Generative AI tools are increasingly accessible. While they offer educational opportunities, they also present new safeguarding risks.

We treat any harmful or unsafe use of AI as a safeguarding matter, managed under this policy.

8.3.1 Core AI safeguarding risks

Staff should be alert to:

- **AI-generated intimate media** (deepfakes)
 - Synthetic or manipulated images, videos or audio that mimic pupils or staff
 - Any explicit, nude or humiliating media created with AI about a pupil will be treated as serious image-based abuse and logged on CPOMS the same day for DSL investigation
- **Algorithmic and interactive grooming**
 - Pupils engaging with public AI chatbots or apps that expose them to sexual, violent, extremist or otherwise harmful content
- **AI-enabled bullying and harassment**
 - Using AI to generate abusive images, memes or text targeting individuals or groups

8.3.2 Operational restrictions

- **Pupils must not access public generative AI tools independently on school devices, unless:**
 - Use is explicitly approved, age-appropriate and supervised, and
 - The tool has been risk-assessed and filtered as necessary
- **Staff must not:**
 - Input names or other identifying details of pupils, families or staff into public AI tools
 - Upload photos, videos or audio of pupils to such tools

8.3.3 Technical and governance measures

Before introducing any new software or digital tool that incorporates AI, the IT Lead and DSL will:

- Complete a Data Protection Impact Assessment (DPIA)
- Assess:
 - Age appropriateness
 - Data retention and sharing
 - Security and filtering requirements

The school will configure network filtering to restrict access to known high-risk AI sites, particularly those focused on image manipulation or adult content.

Any pupil who uses AI or other technology to harm others will be managed under:

- This safeguarding policy (child-on-child abuse and online safety), and
- The Behaviour Policy, with appropriate support as needed.

Section 9: Notifying and Working with Parents/Carers

We recognise the importance of working openly and constructively with parents and carers. However, our duty to safeguard the child will always come first.

9.1 Sharing welfare concerns

- The DSL (or deputy) will usually lead conversations with parents/carers when a welfare concern, suspicion or disclosure arises. At this stage, the safeguarding team will share relevant concerns and information with parents where it is appropriate and safe to do so. Alongside this, staff will continue to exercise professional curiosity by remaining observant, asking respectful questions, and seeking additional context to develop a fuller understanding of the child's circumstances. Sharing information with parents is an important part of working in partnership, whereas professional curiosity is an ongoing

safeguarding practice that helps ensure decisions are informed by all available information and that the child's welfare remains central.

- Other staff must not contact parents/carers about safeguarding concerns without consulting the DSL, to ensure accurate information sharing and not placing a child at greater risk.
- We will not inform parents/carers before making a referral to Children's Social Care if the DSL believes that doing so:
 - Could place the child at increased risk of harm (e.g. domestic abuse, honour-based abuse, forced marriage)
 - Could prejudice a police or social care investigation
 - Is otherwise not in the child's best interests

In such cases the DSL will make a referral to Gloucestershire MASH / Children's Social Care and follow their advice on parental notification. We are also aware that the requirement for seeking parental consent changed in Sep 26 and we follow the latest guidance for this. The only exception to sharing information is where sharing would be more detrimental to the child than not sharing.

9.2 Child-on-child abuse incidents

For child-on-child abuse incidents (including sexual violence, sexual harassment, serious physical assaults or digital exploitation):

- We will normally inform the parents/carers of all children involved as soon as it is safe and appropriate to do so.
- We will share information carefully, ensuring we do not disclose:
 - The identity or personal details of other children involved
 - Specific sanctions applied to other pupils
- The DSL will coordinate with the police and Children's Social Care, where involved, to ensure our communication with parents is consistent with any external investigation.

9.3 Meetings and safety planning

The DSL (with relevant staff and external partners where appropriate) will organise separate meetings for:

Parents/carers of the child who has been harmed

To:

- Explain the risk assessment and protective measures in place
- Listen to and record their views and the child's wishes
- Explain the process, including any multi-agency involvement
- Where online abuse is involved, support them to use tools such as Report Harmful Content or platform-specific reporting to seek takedown of intimate or synthetic media

Parents/carers of the child alleged to have caused harm

To:

- Explain the concerns and the support plan for their child
- Clarify any changes to routines (e.g. seating plans, supervision, access to devices) and the reasons for them
- Explore whether the behaviour may signal that their child is themselves at risk (e.g. exploitation, radicalisation, coercion) and, where appropriate, consider referral to Family Help / early help or other support services.

Section 10: Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with SEND and those with physical or mental health conditions may face additional safeguarding risks. Research shows they are more likely to be abused and face extra barriers to telling someone.

Staff should be particularly alert to:

- Diagnostic overshadowing – assuming changes in behaviour or physical marks are due to the child's condition rather than considering possible abuse or neglect
- Isolation and bullying – pupils with SEND may be targeted for bullying, including online
- Hidden distress – some children may mask distress or show it in non-obvious ways
- Communication barriers – some pupils may not have the language, confidence or means to explain what is happening
- Online and AI risks – some pupils may struggle to distinguish real from manipulated content or understand consequences of copying online behaviour

Staff actions

Staff must:

- Report all concerns to the DSL/Deputy DSL and SENDCo so that vulnerabilities and needs are considered together
- Use accessible communication, visual supports and reasonable adjustments, in line with NHS Accessible Information Standards and the child's individual communication profile
- Never assume that a lack of verbal disclosure means there are no safeguarding concerns.

Section 11: Pupils with a Social Worker

Some pupils will have a social worker due to safeguarding concerns, child in need plans or other welfare issues. These pupils may have experienced significant adversity or trauma and may be more vulnerable to further harm.

The DSL and staff will:

- Actively work with social workers, local authorities and Virtual School Heads (where relevant) to support these children
- Integrate social care involvement into all decisions about:
 - Attendance monitoring and response to absence
 - Behaviour management and exclusions
 - Pastoral and mental health support
- Ensure:
 - Unauthorised absences are responded to promptly with same-day checks and contact with the social worker
 - School intervention plans are trauma-informed
 - All reasonable steps and multi-agency options are considered before suspensions or permanent exclusion.

Section 12: Looked-After Children (LAC) and Previously Looked-After Children (PLAC)

We are committed to meeting the specific needs of looked-after and previously looked-after children.

12.1 Information sharing and governance

We will:

- Ensure relevant staff understand each child's:
 - Legal status, care arrangements and contact permissions
 - Any court orders or restrictions
- Maintain direct contact with:
 - The child's social worker
 - The relevant Virtual School Head (VSH)
- Record any changes in legal status, placements or contact arrangements on CPOMS on the same working day.

12.2 Designated Teacher

Our Designated Teacher for LAC and PLAC is:

- Michelle Ginn

The Designated Teacher will:

- Work closely with the DSL to ensure safeguarding concerns are understood in the context of the child's care history
- Work with the VSH to develop and review Personal Education Plans (PEPs), ensuring Pupil Premium Plus is used to support:
 - Emotional well-being and resilience
 - Academic progress
 - Enrichment and stability
- Monitor behaviour and attendance data for LAC/PLAC to:
 - Identify early signs of difficulty
 - Prevent disproportionate sanctions, suspensions or exclusion.

Section 13: Pupils who are Lesbian, Gay, Bisexual or Gender Questioning

We recognise that pupils who are, or are perceived to be, lesbian, gay, bisexual or gender questioning may face specific risks, including bullying, isolation and poorer mental health.

All such concerns must be addressed through standard safeguarding procedures.

13.1 Supporting pupils questioning their gender

Kingsholm C of E Primary School and Nursery as a statutory duty to safeguard and promote the welfare of all children, including any child who is questioning their gender, as well as their peers, and will consider the impact of any decision on all children affected risk/needs assessments will be considered (further information can be found in KCSIE 2026, para 251-282).

Where a child asks for support with social transition, we will:

- engage parents/carers as a priority and give their views considerable weight, except in the rare circumstances where doing so would place the child at greater risk – in which case the DSL will determine what action is needed to safeguard the child before parents/carers are contacted;
- take a careful approach, recognising that social transition is an active intervention that may have significant effects on a child's wellbeing and longer-term outcomes, and that primary-aged children in particular are very unlikely to be supported in a full social transition;
- consider what is in the best interests of the child and of other children, drawing on clinical and non-clinical professional advice (for example from the SENCo) where relevant, and taking into account any wider health issues or neurodiversity;
- document the decision-making process and keep records, including where a request is not agreed to ensure that toilets, changing rooms, and boarding/residential accommodation designated for one biological sex are not made available to a child of the other biological sex, including as a form of social transition;
- comply with the setting's duties under the Equality Act 2010 and the Human Rights Act 1998, considering whether any policy would place a gender-questioning child at a disadvantage relative to other children, and linking this consideration to the setting's wider inclusion and equality processes

13.2 Sex-based facilities and records

To maintain privacy, dignity and safety for all pupils:

- We will accurately record each pupil's sex in school systems, as required for safeguarding, data and trip planning.
- From age 8 upwards, pupils will ordinarily use toilet and changing facilities that correspond to their biological sex.
- Where a gender-questioning pupil is uncomfortable using these, we will consider individual, private alternatives (e.g. a single-occupancy unisex facility), without reducing access to single-sex spaces for other pupils.
- Residential trips and certain sports activities will be organised by sex, while being sensitive to the child's emotional wellbeing and privacy.

Section 14: Complaints and Concerns about Safeguarding

We take all concerns and complaints about safeguarding practice; staff conduct and our safeguarding culture seriously.

14.1 Allegations and concerns about staff

Procedures differ depending on whether the concern meets the harm threshold or is a low-level concern (see Section 7.7 and Appendix 2).

- If a concern suggests a member of staff may have:
 - it will be treated as a harm threshold allegation and managed in line with KCSIE Part 4. The Headteacher will consult the LADO within 24 hours.
 - Harmed a child
 - Committed a criminal offence against or related to a child
 - Behaved in a way that may pose a risk of harm
 - Behaved in a way that indicates they may not be suitable to work with children
- Any behaviour that falls below this threshold but is inconsistent with the Staff Code of Conduct must still be reported to the Headteacher as a low-level concern.

If the concern involves the Headteacher, it must be reported directly to the Chair of Governors.

14.2 Whistleblowing and external escalation

Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding arrangements.

- Internal concerns should follow the school's Whistleblowing Policy.
- If staff feel unable to raise concerns internally, or feel their concern has not been addressed, they may seek advice or report concerns via:
 - The NSPCC Whistleblowing Advice Line: 0800 028 0285 / help@nspcc.org.uk
 - Other external routes set out in the Whistleblowing Policy.

Section 15: Record-Keeping and Safeguarding Files

We keep accurate, secure safeguarding records in line with data protection law and statutory retention schedules.

15.1 Recording standards

All safeguarding concerns, disclosures and observations must be:

- Recorded on CPOMS (or successor system) as soon as possible and by the end of the same working day
- Factual, clear and complete, including:
 - What was seen or heard (using the child's own words where possible)
 - Actions taken and who was informed
 - Decisions made and the rationale
- Updated to include:
 - Any referrals to or feedback from external agencies
 - Outcomes of meetings, plans and reviews

Staff must not delete or overwrite existing entries. Corrections or additions must be added as dated addendums, preserving the audit trail, however DSL/DDSL's can edit to ensure that entries are factually correct (e.g dates/times/right child identified etc).

If in doubt whether to record something, staff must err on the side of caution and/or consult the DSL.

15.2 Security and access

- Each child with safeguarding concerns has a separate Child Protection File, distinct from their main school file.
- Access is restricted to the DSL, Deputy DSLs and authorised staff who need the information to keep the child safe.

15.3 Transferring files

When a pupil moves school:

- The DSL will transfer the Child Protection File securely and separately from the main pupil file to the new setting's DSL.
- This should normally be done:
 - Within 5 working days for an in-year transfer
 - Within the first 5 working days of the new term for a standard phase transfer
- For pupils with complex needs or open social care involvement, the DSL will also arrange a direct conversation or meeting with the receiving DSL.
- The school will obtain and retain written confirmation that the file has been received.

Section 16: Training and Professional Development

We ensure all staff, leaders and governors are trained and confident to recognise, respond to and refer safeguarding concerns.

16.1 All staff

All staff will:

- Receive safeguarding and child protection induction training, including:
 - This policy
 - Part 1, Part 5 and Annex B of KCSIE
 - How to report concerns and use CPOMS
- Receive regular (at least annual) updates via staff meetings, briefings or e-learning.

Training will enable staff to:

- Recognise signs of abuse, neglect, exploitation and serious violence
- Understand the school's filtering and monitoring arrangements and their responsibilities
- Identify online risks, including generative AI, deepfakes and radicalisation
- Know how to respond to disclosures and how to escalate concerns.

Volunteers and contractors will receive appropriate, role-specific safeguarding information and induction. Checks on volunteers and contractors will be carried out in line with KCSIE and our Safer Recruitment Policy.

16.2 DSL and Deputy DSLs

The DSL and Deputy DSLs will:

- Undergo formal DSL training at least every 2 years, and
- Receive regular updates (at least annually) on:
 - Local and national safeguarding issues
 - Online safety and cyber security
 - Data protection and information sharing
 - GSCP procedures and thresholds.

16.3 Governing Body

All governors will receive safeguarding and online safety training at induction and updated regularly so they can:

- Understand their strategic role
- Provide appropriate challenge and support on safeguarding practice.

The Chair of Governors will undertake additional training on managing allegations against the Headteacher.

16.4 Safer recruitment and online searches

- At least one member of each recruitment panel will have Safer Recruitment training.
- We will carry out all required pre-employment checks.
- In line with KCSIE, we will conduct appropriate online searches for shortlisted candidates, informing candidates at shortlisting that such checks will take place.

16.5 Supervision and staff wellbeing

Staff working directly with pupils and families may be exposed to challenging or distressing information. To support them we will:

- Provide regular safeguarding supervision for DSLs and key pastoral staff
- Offer opportunities for staff to discuss concerns and manage the emotional impact of safeguarding work.

Section 17: Monitoring Arrangements

This policy will be reviewed annually by the DSL and updated in line with:

- Changes to legislation or statutory guidance (including KCSIE and Working Together)
- Changes to local safeguarding arrangements or school context
- Learning from safeguarding incidents and case reviews.

The updated policy will be approved by the full Governing Body each year.

Appendix 1: Statutory Typologies and Indicators of Abuse

Abuse, neglect, and safeguarding vulnerabilities are rarely isolated incidents. Multiple forms of maltreatment frequently overlap. Staff must avoid viewing incidents in isolation and instead maintain professional curiosity regarding cumulative patterns of harm.

1. Physical Abuse

Physical abuse involves hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing intentional physical harm to a child.

- **Perceived Illness Induction:** Physical harm also includes scenarios where a parent or carer fabricates symptoms, deliberately induces illness, or inappropriately medicates a child (historically termed Fabricated or Induced Illness).
- **Primary Indicators:** Unexplained bruising (especially on soft parts of the body), handprints, cigarette burns, bite marks, or a child showing sudden fear of physical touch or parental collection.

2. Emotional Abuse

Emotional abuse is the persistent psychological maltreatment of a child, causing severe, adverse impacts on their emotional and behavioural development. Elements of emotional abuse are present in all forms of ill-treatment. Emotional abuse includes:

- **Devaluation:** Conveying to a child that they are worthless, unloved, inadequate, or valued only to meet someone else's needs.
- **Silencing:** Purposely denying a child opportunities to express their views, mocking their communication methods, or ignoring their attempts to interact.
- **Inappropriate Expectations:** Imposing developmental expectations beyond a child's age capacity, or conversely, severe overprotection that prevents normal social exploration.
- **Domestic Adversity:** Exposing a child to the domestic abuse, violence, or severe ill-treatment of another person within the household.
- **Digital and AI Targetisation:** Extreme bullying (including cyber-bullying), tracking, or the generation of harmful synthetic media (such as AI-altered deepfake images used to humiliate a child), causing them to feel unsafe or constantly targeted.

3. Sexual Abuse and Exploitation

Sexual abuse involves forcing, tricking, or enticing a child to engage in sexual activities. This can occur with or without physical violence, and regardless of whether the child consciously understands what is happening. Sexual abuse can be perpetrated by adults of any gender, or by other children (Child-on-Child abuse).

- **Contact Activities:** Physical assault, penetration, or non-penetrative actions such as forced kissing, touching, or rubbing outside of clothing.
- **Non-Contact and Digital Abuse:** Forcing children to view or produce sexual images, watch sexual acts, or engage in age-inappropriate behaviours. This includes online grooming, digital solicitation, and peer-to-peer distribution of youth-produced sexual imagery.

4. Neglect

Neglect is the persistent failure to meet a child's basic physical, medical, educational, and emotional needs. It is highly likely to cause serious impairment to the child's long-term health or development. Neglect can begin during pregnancy through maternal substance misuse.

Following birth, neglect involves a persistent failure to:

- **Basic Needs:** Provide adequate nutritious food, clean and weather-appropriate clothing, and safe shelter (including abandonment or locking a child out).
- **Safety Protocols:** Protect a child from physical or environmental harm, or leave them under the supervision of inadequate, unvetted, or unsafe caregivers.
- **Medical Oversight:** Secure essential medical, dental, or therapeutic treatment, or ignore directed medical advice for chronic health conditions.
- **Emotional Responsiveness:** Ignore a child's basic need for affection, comfort, and cognitive stimulation, leading to severe emotional withdrawal.

Appendix 2: Allegations of Abuse Made Against Staff (Including Low Level Concerns)

Section 1: Allegations That May Meet the Harm Threshold

This section aligns with Part 4 of KCSIE. It governs how the school manages allegations against any current member of staff, supply teacher, volunteer, or contractor working on school premises.

1.1 The Harm Threshold Criteria

This procedure applies when an individual is alleged to have:

- **Harmed a child:** Behaved in a way that has harmed a child or may have harmed a child.
- **Committed an offence:** Possibly committed a criminal offence against, or related to, a child.
- **Posed a risk:** Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- **Demonstrated unsuitability:** Behaved (or may have behaved) inside or outside of school in a way that indicates they are unsuitable to work with children.

1.2 Case Management and Premises Sharing

- **The Case Manager:** The Headteacher acts as the Case Manager. If the allegation concerns the Headteacher, the **Chair of Governors** takes the role.
- **Third-Party Premises Users:** If an allegation arises regarding an incident during an external club, service, or community activity using school grounds, the school will apply these safeguarding procedures, notify the LADO immediately, and ensure the third-party provider takes matching action.

1.3 Strict Suspension Safeguards and Risk Assessments

Suspension will not be the default position. It is only deployed if a child is at immediate risk of harm, or the case is severe enough to warrant dismissal. A member of staff may be asked to take a period of paid leave whilst time is taken to investigate incidents. This will not be recorded as a suspension and will not be placed on the staff member's file.

The Case Manager will assess alternative measures, documenting exactly why they are viable or rejected, and will action an overarching risk assessment when appropriate:

- **Supervised Contact:** Deploying a co-worker to remain present during all instructional sessions.
- **Redeployment:** Temporarily moving the individual to an administrative role or an alternative local authority site with no child access.
- **Class Reassignment:** Moving the child to an alternative class *only* after consulting parents and confirming it is not a punitive measure.

If suspension is enforced, the written rationale must be agreed with the LADO. Written notification must be delivered to the employee within **1 working day**, alongside the name of a dedicated welfare contact.

1.4 Investigative Outcomes Definitions

- **Substantiated:** Sufficient objective evidence exists to prove the allegation.
- **Malicious:** Clear evidence disproves the allegation, proving a deliberate intent to deceive or cause harm.
- **False:** Clear evidence disproves the allegation, without malicious intent.
- **Unsubstantiated:** Insufficient evidence exists to either prove or disprove the allegation (implies neither guilt nor innocence).
- **Unfounded:** There is no evidence, proper basis, or merit to support the allegation.

1.5 Procedure for Allegations

When an allegation is made, the Case Manager will execute these steps in order:

1. **Initial Fact-Finding:** Conduct swift, basic enquiries strictly to verify facts. Staff must not cross-examine witnesses or compromise potential police evidence.
2. **LADO Contact:** Discuss the context with the LADO to agree on a course of action. If an immediate criminal risk or physical danger is present, contact the police first, then notify the LADO immediately after.
3. **GCC HR:** Seek advice from GCC HR if required.
4. **Accused Notification:** Inform the accused individual of the allegations as soon as LADO (and police/social care) clearance is granted. Share only the information agreed upon by those external agencies.
5. **Community Risk Check:** Evaluate if the individual's behaviour poses a risk to other children in the community or their own family. The DSL will handle referrals to children's social care if required.
6. **Parental Communication:** Notify the parents or carers of the child involved immediately, subject to police or social care approval. Inform them of their statutory duty to maintain confidentiality regarding the staff member while investigations are live. Provide updates on the case progress without sharing private staff details.
7. **Staff Support:** Assign a non-investigative staff representative to provide regular updates to the accused. Recommend they contact their union and provide access to occupational health or welfare counselling.
8. **DBS and TRA Referral Rules:** If the individual is dismissed, resigns, or leaves prior to the conclusion of the case, and the allegation is substantiated, the school holds a legal duty to refer the matter. A referral must be sent to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA) within 5 working days of the case concluding.

Informing Ofsted

1. Mandatory Early Years / Reception Notifications (Children Under 8)

If an allegation is made against a teacher, teaching assistant, or worker in a **Reception class or Nursery**, notifying Ofsted is a statutory requirement. (This is any allegation of harm as the 'serious requirement' has been removed, but it does not include: General staffing issues, employment disputes, or minor internal matters that do not cross the threshold into a safeguarding concern of harm or abuse)

- **The Deadline:** The school must notify Ofsted **as soon as reasonably practicable, and strictly within 14 days** of the allegation or incident occurring.
- **The Process:** The notification cannot be done via phone or email. The school must submit the details electronically using the official [GOV.UK Report a Serious Childcare Incident Service](#).
- **Failure to Comply:** Failing to notify Ofsted of a serious allegation in the Early Years Foundation Stage (EYFS) within the 14-day window is a **criminal offence** and a breach of registration requirements.

2. Mainstream Primary (Key Stage 1 & Key Stage 2 / Children Aged 8 and Over)

For staff working exclusively with Key Stage 1 or Key Stage 2 pupils (Years 1 to 6), the school **does not** routinely submit a direct, immediate notification form to Ofsted for standard allegations. Instead, the following rules apply:

- **Statutory Duty:** Under Keeping Children Safe in Education (KCSIE) the school must contact the **Local Authority Designated Officer (LADO Team) within 24 hours**.
- **LADO Escalation:** The LADO framework manages multi-agency oversight. If the allegation reveals severe institutional failures or systemic safeguarding risks, the LADO or the Local Authority may choose to brief Ofsted directly.
- **During Inspection:** If an allegation is live or has recently concluded, the school must disclose the case log, risk assessments, and suspension rationales directly to the lead inspector during an Ofsted Safeguarding Review.

Summary of Priority Actions

Regardless of the child's age, **never investigate the allegation internally, question witnesses, or confront the staff member** before contacting external bodies.

The sequence should always be:

1. Contact the **LADO** immediately (within 1 working day).
2. Contact the **Police** if a crime is suspected.
3. Log the incident on **CPOMS** with full rationales.
4. Notify **Ofsted within 14 days** if the staff member works with children under the age of 8.

Post-Allegation Management and Agency Staff Protocols

We apply strict legal safeguards and explicit multi-agency workflows following any threshold safeguarding concern or active investigation.

Interim Prohibition and Police Cooperation

- **Interim Orders:** If notified that the Secretary of State has issued an Interim Prohibition Order, the school will suspend the individual from all teaching duties immediately, pending final TRA conclusions.
- **Evidence Sharing:** At the start of any police investigation, the Case Manager will explicitly ask officers to seek consent from all parties to share statements and evidence. This ensures the school can proceed with its internal disciplinary processes without waiting for a full criminal prosecution to conclude.

Statutory Protections for Supply and Contracted Staff

We owe the same safeguarding duties to children minded by temporary, agency, or contracted staff as it does to permanent employees. We will never terminate a placement solely to avoid an investigation.

- **Fact-Finding Lead:** The school takes the lead role in gathering facts and communicating directly with the LADO. The supply agency must be fully included but cannot handle the investigation independently.
- **Joint Decision-Making:** The Case Manager will collaborate with the agency's HR department to determine if suspension or internal redeployment is appropriate while evidence is reviewed.
- **Contextual Data Sharing:** The school will require the agency to disclose any historical lower-level concerns or patterns of behaviour on the individual's file during the initial multi-agency strategy meeting.

Management of Allegations Against Staff, Trainee Staff and Volunteers

While keeping children safe is our primary focus, investigations will proceed quickly to minimise stress for the accused staff member.

1. Timelines for Initial Action:

- **Immediate Internal Notification:** Any member of staff who receives or makes an allegation must report it to the Headteacher/Deputy Head immediately. If the allegation is against the Headteacher it must be reported directly to the Chair of Governors.
- **LADO Referral (within 24 hours):** The Head/Deputy (Case Manager) must contact the Local Authority Designated Officer (LADO) within 1 working day of the allegation being made, if the 'harm threshold' is met. (LADO should be contacted for a consultation within this timeframe if there is ambiguity about whether the threshold has been met).
- **No Further Action (Within 3 Working Days):** if the initial evaluation with the LADO reveals the allegation is demonstrably false or unfounded, the matter will be resolved, and any necessary support or remediation for the staff member will be implemented within **3 working days**.

- **Internal Disciplinary Hearing (within 15 Working Days):** Where an external investigation (Police/Social Care) is not required, and the matter proceeds straight to an internal disciplinary hearing, the school aims to hold this hearing within **15 working days** of the initial evaluation.
- 2. Monitoring and Target Resolution Milestones**
- The school is committed to resolving allegations as quickly as possible, consistent with a fair and thorough process. In line with Department for Education (DfE) targets, the school works towards the following national benchmarks:
- 80% of cases will be resolved within 3 months
 - 95% of cases will be resolved within 6 months
 - 100% of cases will be resolved within 12 months.
- 3. Record Keeping, References and Support**
- **Retention of Records:** If an allegation is found to be malicious or unsubstantiated, it must be removed from the staff member's personnel file. For all other cases reaching the threshold, a comprehensive summary, including explicit rationale, must be kept on their confidential personnel file until the person reaches normal retirement age, or for 10 years from the date of the allegation (Whichever is longer). A copy of the record must be given to the staff member.
 - **Duty of Care:** The school will appoint a named contact person to provide regular updates and support to the identified staff member throughout the duration of the timeline..
 - **Future Reference Declaration:** Every retained case file must contain a clear, explicit declaration confirming whether the incident will be disclosed in future employment references.
 - **Substantiated Outcomes:** References will include factual, verified details of substantiated safeguarding allegations. Speculations, personal opinions, and allegations that did not meet a substantiated threshold are strictly excluded.
 - **Exempt Outcomes:** The school will never disclose or refer to allegations found to be false, unfounded, unsubstantiated, or malicious. This applies equally to historic or repeated claims that were discarded upon investigation.

Concluding Action and Mandated Referrals

- **Substantiated Cases:** If an allegation is substantiated and the individual is dismissed, leaves their role, or resigns mid-investigation, the school holds a legal duty to act. A referral must be sent to the **DBS**(and the **TRA** for teaching staff) within **5 working days** of the individual's exit.
- **Reintegration:** If an employee returns to work after suspension, the Case Manager will design a formal return-to-work plan. This includes managing daily interactions with the child who made the report to ensure both parties feel safe and supported.
- **Cries for Help:** If an allegation is proven false or malicious, the DSL will assess the child/adult who made the claim. If the false report was a cry for help or indicates wider trauma, an immediate referral to children's social care (Child), other agencies as appropriate (Adult) will be initiated.

Confidentiality and Information Governance

- **Speculation Control:** The Case Manager will coordinate with the LADO to manage local gossip, protect the anonymity of the accused, and issue scripted, objective updates to the school community if leaks happen.

The school maintains strict information governance, transparent reference standards, and an active low-level concerns framework to promote a safe institutional culture.

Safeguarding Accountability and Learning Lessons

Post-Incident Reviews

Following any **substantiated** allegation, the Case Manager will conduct a formal review with the Local Authority Designated Officer (LADO) to assess structural risks. This review focuses heavily on the use of suspension:

- Evaluating whether the suspension was fully justified or if safer alternative arrangements were missed.
- Analysing the total duration of the suspension to identify any delays.
- Documenting lessons to establish how future, similar investigations could be safely executed while keeping the staff member active in a non-contact or redeployed role.

Non-Recent Allegations

- **Disclosures by Children:** Any non-recent or historic allegations of abuse reported by a current pupil will be referred to the LADO immediately under standard local authority child protection tracks.
- **Disclosures by Adults:** If an adult contacts the school to disclose that they were abused at the setting as a child, the school will log the report, inform the LADO for institutional oversight, and actively support the individual to report the matter to the police.

Section 2: Concerns That Do Not Meet the Harm Threshold

This section governs how the school intercepts and documents behaviours that fall below the statutory harm threshold but breach professional boundaries.

Definition of Low-Level Concerns

A low-level concern is any minor or nuanced behaviour, no matter how small, indicating an adult working on behalf of the school may have acted in a way that is inconsistent with the **Staff Code of Conduct**. This includes digital actions or inappropriate behaviour outside of working hours that does not meet the LADO referral threshold.

Examples include, but are not limited to:

- Being overly familiar or friendly with children.
- Demonstrating clear favouritism toward specific pupils.
- Using a personal mobile phone or digital device to photograph pupils.
- Taking a pupil into a secluded area or behind a closed door on a one-to-one basis without prior authorisation.
- Humiliating pupils, using demeaning language, or mocking a child's communication needs.
- Inappropriate digital interactions, such as sending personal messages to parents or interacting with pupils on unapproved social media or gaming networks.

It is noted that Low Level Concerns could also lead to disciplinary measures in line with the school's disciplinary and conduct policy. Each incident will be investigated and dealt with individually.

Cultivating a Culture of Openness

The school actively encourages staff to share low-level concerns or self-refer when boundaries are blurred. This is achieved by:

- Providing clear, distinct training on the boundary line between expected professional behaviour and problematic conduct.
- Creating secure, trusted reporting pathways directly to the Headteacher.
- Handling all raised concerns responsively, sensitively, and proportionately without automatically triggering a punitive disciplinary track.

Responding to and Logging Low-Level Concerns

- **Evidence Gathering:** The Headteacher will review third party reports by speaking directly to the source, the individual involved, and any immediate witnesses. The Headteacher remains the final arbiter on outcomes, collaborating closely with the DSL.
- **Written Log Requirements:** Every low-level concern must be logged in writing, documenting the precise context, the corrective action taken, and the underlying professional rationale.

- **Pattern Auditing:** These logs are kept securely and reviewed termly to identify hidden patterns of problematic behaviour. If a cumulative pattern shows an individual's behaviour is escalating to meet the harm threshold, the case will be escalated to the LADO immediately.
- **Supply and Contractor Tracking:** If a low-level concern involves a supply teacher or contractor, the school will securely notify their agency employer so the agency can cross-reference the data against other placements.

Low-Level Concerns in References

Low-level concerns will **never** be included in external employment references, unless:

- The cumulative pattern of concerns eventually met the harm threshold, was referred to the LADO, and resulted in a substantiated safeguarding outcome.
- The issue directly connects to broader performance tracking, such as persistent misconduct or systemic capability issues that would normally be disclosed in an HR reference.
- The issue led to a formal disciplinary warning.

Appendix 3: Specific Safeguarding Issues

Staff must treat the specific safeguarding issues below with high professional curiosity. In primary settings, early intervention is critical as children are increasingly targeted by sophisticated external threats. Training around safeguarding issues in Annex A (including online safety and filtering and monitoring) will be integrated, aligned, and considered as part of a whole school safeguarding approach.

Mental Health

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their learners. 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, and or may require early help support or the involvement of a more specialist service.

This can include self-harm, signs of an eating disorder, suicidal ideation or suicide. Where a mental health concern may indicate that a child is suffering, or is at risk of suffering, abuse, neglect or exploitation, staff will follow the setting's usual safeguarding reporting route to the DSL without delay, so the concern can be assessed alongside any other information held about the child (KCSIE 2026, para 225).

We utilise the Mental Health in Schools Team (MHST) for early intervention and advice, and signpost staff, learners and families to The [NHS Every Mind Matters](#) website. In addition, the [Hub of Hope](#) is the UK's leading mental health support database. (KCSIE 2026, paras 230-232)

Assessing Adult-Involved Nude and Semi-Nude Sharing

All adult-involved nude or semi-nude image sharing incidents constitute **Child Sexual Abuse and Exploitation (CSAE)**. They require an immediate, same-day referral to the Police and Children's Social Care. Because these incidents frequently masquerade as peer-to-peer or child-on-child sharing, staff must understand the two primary adult-led profiles:

1.1 Sexually Motivated Incidents (Grooming & Coercion)

External adult offenders use public online platforms (gaming lobbies, chatrooms, and social media) to target primary-aged children, often by creating false identities that mimic other children.

- **The Progression:** Offenders quickly move the child from a public forum into private messaging or End-to-End Encrypted (E2EE) environments to evade school or parental filtering and monitoring systems.
- **The Coercion:** To normalise the behaviour, the offender may share pornography or synthetic, AI-generated child abuse material. Once a child sends an image, the offender uses blackmail (threatening to send the image to friends, family, or teachers) to extort further material.

Financially Motivated Incidents (Sextortion)

Carried out by highly organised, often overseas, cyber-criminal groups motivated purely by illicit profit.

- **The Methods:** Criminals contact children via direct messaging, often using hacked accounts belonging to the child's actual peers. They may manipulate standard public photos using generative AI tools to create realistic, fake nude images (deepfakes).
- **The Demands:** The group threatens to leak the real or synthetically manufactured images to the school community unless money, gift cards, or gaming credits are paid. In some cases, they pressure children to share family bank account details, exploiting them for money laundering.

Key Digital Indicators for Staff:

- A pupil mentions being contacted by an unknown online account that claims to be a child.
- Sudden, anxious behavior or secrecy regarding personal devices or school IT assets.
- A pupil shows signs of severe distress linked to online interactions or demands for money.
- Unsolicited gifts, digital currency, or high-value gaming skins appearing on a pupil's profile.

Children Absent from Education (CAE)

A child's absence from school, particularly when the absences are regular or unexplained, is a primary indicator of hidden safeguarding vulnerabilities. Prolonged or pattern-based absence must be treated as a potential warning sign of abuse, neglect, exploitation, or severe mental health crises.

High-Risk Vulnerability Cohorts

While any child missing education requires attention, staff must track high-risk categories with vigilance:

- Children with active local authority involvements (Social Worker, Child in Need, or Looked-After status).
- Pupils from Gypsy, Roma, and Traveller communities.
- Children belonging to service personnel in families subject to sudden relocation.
- New migrant, refugee, or asylum-seeking families unfamiliar with UK educational systems.
- Pupils showing indicators of impending forced marriage, Female Genital Mutilation (FGM), or travel to conflict zones.

Statutory Enforcement and Local Authority Actions

- **Unauthorised Absence Alerts:** The school enforces a strict, same-day contact procedure for any unexplained absence. If a vulnerable pupil is absent without explanation, the DSL will notify their allocated social worker immediately.
- **De-registration Compliance:** The school will never remove a pupil's name from the admission register at non-standard transition points without securing explicit confirmation of their new educational setting.
- **Children Missing Education (CME) Tracking:** If a child leaves the school and their destination remains unknown, the school will initiate joint, reasonable enquiries with the local authority within statutory timelines, formally reporting them under local CME protocols.
- **Immediate Danger:** If a staff member suspects an absence is directly linked to an immediate, severe risk (such as imminent FGM or child abduction), they must bypass standard waiting periods and contact the Police and Children's Social Care immediately.

Child Criminal Exploitation (CCE) and County Lines

Child Criminal Exploitation (CCE) occurs when individuals or organised networks exploit an imbalance of power to manipulate, coerce, or frighten a child into committing criminal acts. CCE can occur without physical contact via online spaces, and the child's apparent "consent" is legally irrelevant due to the presence of coercion.

In primary schools, exploiters frequently target younger children to act as couriers, believing they are less likely to draw police suspicion. Children are forced to transport drugs or weapons (County Lines), launder money through online gaming accounts, shoplift, or pickpocket.

Indicators of CCE in Primary Pupils

- **Unexplained Possessions:** Appearing with expensive new clothes, phones, vouchers, or large amounts of cash.
- **Behavioral Shifts:** Sudden emotional withdrawal, increased aggression, or using highly inappropriate, street-level criminal slang.
- **Physical Red Flags:** Unexplained injuries, signs of neglect, substance misuse, or possession of multiple mobile phones/SIM cards.
- **Attendance Tracking Breaches:** Going missing from home or school, arriving late, or being seen associating with older, unrelated youths or known local exploiters.

Direct Response Protocol for Staff

If a staff member suspects a pupil is being targeted or controlled via CCE:

1. **Immediate Logging:** Document the precise observation, behavioral shift, or disclosure on CPOMS before the end of the working day.
2. **DSL Intervention:** The DSL will immediately review the pupil's cumulative profile, bypass internal disciplinary tracks if the behavior is driven by exploitation and trigger local multi-agency safeguarding hubs (MASH).
3. **National Escalation:** Where an organised network is identified, the DSL will collaborate with local police to submit a formal referral via the National Referral Mechanism (NRM) to protect the child from criminal prosecution.

Cybercrime and Advanced Digital Threats

Cybercrime targeting primary school community's compromises both technical networks and individual pupil safety. Cybercriminals frequently exploit children through social engineering, online grooming, and gaming platforms.

Digital Risk Typologies

- **Exploitation and Grooming:** Perpetrators use online multiplayer games, chat apps, and social networks to groom children, frequently shifting communication to end-to-end encrypted (E2EE) platforms to hide their tracks.
- **Malicious Media Manipulation:** The misuse of generative AI to create non-consensual synthetic media, such as altering a pupil's standard school photograph into a harmful or humiliating deepfake image.
- **Mule Account Recruitment:** Criminal networks targeting older primary pupils or their families to facilitate financial scams, identity theft, or data harvesting, occasionally tricking families into using personal bank accounts for money laundering.

School Defences and Staff Obligations

- **Technical Safeguards:** The school operates an automated, real-time filtering and monitoring system across all devices and networks.
- **Staff Interventions:** Staff must remain vigilant for pupils bypassing network restrictions (such as using unauthorised VPNs) and immediately report any technical breaches or safety alerts to the DSL.
- **Digital Literacy:** Pupils are explicitly taught how to recognise digital manipulation, identify phishing attempts, keep personal data secure, and report online harm through our digital safety curriculum.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a severe form of child sexual abuse. It occurs when an individual or group exploits an imbalance of power to coerce, manipulate, or deceive a child into sexual activity. This is frequently done in exchange for gifts, money, digital currency, affection, or perceived protection.

Primary Context and Coercion Dynamics

- **The Illusion of Consent:** Legally, a child cannot consent to exploitation. Victims in primary settings rarely understand they are being abused; they are often manipulated into believing they are in a special or protective relationship with their abuser.
- **Non-Contact and Online CSE:** Abuse occurs through physical contact and increasingly through digital spaces. This includes forcing or tricking children into sharing youth-produced sexual imagery, participating in explicit webcam streams, or engaging in highly sexualised text dialogues.
- **Third-Party Proliferation:** CSE occurs when images or videos originally taken or shared under coercion are copied, traded, or sold online by external networks without the child's immediate knowledge.

Specific CSE Indicators for Primary School Staff

Staff must maintain high professional curiosity regarding the following red flags:

- A pupil associating with, or being collected from school by, significantly older teenagers or adults who are not family members.
- Possession of unexplained luxury items, new mobile devices, clothing, or digital gaming credits.
- Sudden, highly sexualised language, drawing, or play that is completely inappropriate for their developmental stage.
- Severe emotional shifts, secretiveness regarding digital devices, or uncharacteristic school absence patterns.
- Physical indicators, including recurrent stomach pains, signs of physical neglect, or sudden disclosures regarding inappropriate adult contact.

Reporting CSE Concerns

If any staff member suspects a child is experiencing or is at risk of CSE, they must log the concern on **CPOMS** immediately and brief the DSL on the same working day. The DSL will trigger local multi-agency safeguarding hub (MASH) pathways, notifying Children's Social Care and the Police.

Children with Family Members in Prison

The imprisonment of a parent or close family member is a recognised Adverse Childhood Experience (ACE) that can trigger sudden, severe, safeguarding vulnerabilities.

Vulnerability Profile

Children experiencing the incarceration of a family member face heightened risks, including:

- **Severe Psychological Trauma:** Suffering from sudden separation anxiety, complex grief, social stigma, and peer-targeted bullying.
- **Academic and Behavioral Shifts:** Showing uncharacteristic drops in academic performance, emotional withdrawal, or sudden escalation into anti-social behavior.
- **Socioeconomic Instability:** Experiencing immediate household poverty, displacement, or changes in legal care arrangements.

Mandatory Roles for the DSL and Staff

- **Vigilance and Early Help:** The DSL and Deputy DSLs will maintain an internal, highly confidential register of pupils affected by family incarceration to ensure their emotional and academic welfare is monitored proactively.
- **Trauma-Informed Support:** The school will coordinate early help interventions, providing these pupils with confidential pastoral care and counseling resources to mitigate isolation.
- **Information Governance:** All details regarding a family member's legal or prison status must remain strictly confidential within our secure safeguarding systems to protect the pupil from local gossip and playground stigma.

Child-on-Child Abuse

We enforce a strict, zero-tolerance approach to all forms of child-on-child abuse. Staff must never dismiss abusive peer behaviours as "banter," "having a laugh," part of growing up' 'boys being boys' or normal developmental phases. We recognise that a lack of reports does not mean abuse is not occurring; children often hide peer abuse due to fear or shame. This abuse can happen face-to-face, online, or across both spaces simultaneously, inside or outside school hours.

Typologies of Child-on-Child Harm in Primary Settings

While child-on-child abuse can take many forms, in our setting it is most likely to manifest as:

- **Bullying and Exclusion:** Persistent physical, verbal, or psychological bullying, including cyber-bullying, prejudice-based bullying, and discriminatory harassment targeted at a child's protected characteristics.

- **Physical Aggression:** Hitting, kicking, biting, hair-pulling, or forcing peer group submission. This includes instances where digital platforms are used to coordinate, film, threaten, or encourage physical attacks.
- **Harmful Sexual Behaviour (HSB):** Sexual comments, jokes, or peer-targeted sexual harassment. It also includes forcing a peer to engage in non-consensual sexual play, or instances of "upskirting" (taking unauthorised photos under clothing to cause distress or humiliation).
- **Youth-Produced Sexual Imagery:** The consensual or non-consensual creation or distribution of nude or semi-nude images and videos.
- **Initiation and Hazing:** Coercive rituals or humiliating tasks imposed on a child as a condition for being accepted into a peer group or playground clique.

Digital Peer Harassment and AI Harm

Where peer abuse occurs online, it frequently takes place within closed chat groups or end-to-end encrypted (E2EE) apps. Staff must look out for indicators of:

- **Group-Based Bullying:** The sharing of abusive, harassing, or misogynistic/misandristic messages within class chat groups.
- **Digital Solicitation:** Pressuring or tricking peers into sharing indecent images or distributing youth-produced imagery across messaging networks without consent.
- **Synthetic Media Exploitation:** Utilising accessible generative AI tools to create fake, altered, or humiliating images of a peer to mock or alienate them within the school community.

Developmentally Informed Response

When responding to harmful sexual behaviour or physical abuse between children, the DSL will carefully balance the **ages and developmental stages** of the pupils involved. The school recognises that children who display abusive or harmful behaviours toward their peers have frequently experienced their own hidden trauma, neglect, or abuse. While maintaining strict boundaries to keep the victim safe, the school will deploy trauma-informed pastoral support plans for both the victim and the child displaying the behaviour.

Domestic Abuse

Children are never merely "passive witnesses" to domestic abuse. Under UK law, any child who sees, hears, or directly experiences the effects of domestic abuse within their household is legally recognised as a **victim of domestic abuse**.

Scope and Typologies

Domestic abuse can occur between parents, carers, or wider family members within the household. Anyone can be a victim, regardless of gender, age, ethnicity, or socioeconomic background. It encompasses:

- **Intimate Partner Violence:** Physical, sexual, psychological, or emotional abuse between adults in the home.
- **Coercive Control:** Patterns of intimidation, isolation, financial deprivation, and monitoring of daily life.
- **Child-to-Parent Violence:** Physical or emotional abuse directed from an adolescent or older child toward a parent or carer.

Institutional Impact and Vigilance

Exposure to the chaos and fear of domestic abuse causes severe, long-lasting emotional and psychological trauma. It directly impairs a child's health, brain development, emotional resilience, and ability to learn. Staff must maintain a high level of professional curiosity if a child shows sudden drops in academic focus, intense hyper-vigilance, uncharacteristic regression, separation anxiety, or extreme emotional outbursts.

Operation Encompass Protocol

To ensure seamless multi-agency protection, the school actively participates in the **Operation Encompass** framework:

- **The Notification:** If police attend a domestic abuse incident where a child from our school was present in the household, the police will securely transmit an automated alert to our DSL before the start of the next school day.
- **Immediate School Action:** Upon receiving an Operation Encompass alert, the DSL will discreetly inform the child's class teacher. This ensures the child is met with immediate, quiet pastoral kindness, flexible academic expectations, and proactive emotional support. The notification is securely logged on CPOMS, and external safety plans are reviewed without causing additional stigma or distress to the pupil.
- **School staff** will provide ongoing pastoral support

Homelessness and Housing Instability

Being homeless, residing in temporary or insecure accommodation, or being at risk of displacement represents an immediate, serious threat to a child's physical safety, mental health, and educational development.

- **Hidden Root Causes:** Staff must recognize that indicators of homelessness are often triggered by underlying family challenges, including severe household debt, mounting rent arrears, domestic abuse, anti-social behaviour, or sudden evictions.
- **Dual Action Pathways:** The DSL and Deputy DSLs will maintain an up-to-date registry of localised referral pathways into the **Local Housing Authority** to seek housing support for families.
- **Bypassing Delays:** Standard housing referrals must never replace statutory protection routes. If the context of homelessness reveals that a child has suffered or is at risk of direct neglect, exploitation, or abuse, the DSL will bypass housing administration and file an immediate threshold referral to **Children's Social Care**

So-Called "Honour-Based" Abuse (HBA)

So-called "Honour-Based" Abuse encompasses a spectrum of violent crimes and coercive control tactics committed to defend the perceived "honour" of a family or community structure. This includes practices such as Female Genital Mutilation (FGM), forced marriage, and breast ironing.

- **Multi-Perpetrator Networks:** HBA is rarely an isolated incident involving a single parent. It typically involves a highly organised, wider network of family members or community influencers applying extreme psychological and physical pressure.
- **Staff Responsibility:** All staff must maintain professional curiosity regarding these practices. Any indicator or disclosure must be shared with the DSL immediately on the same working day, triggering local safeguarding partnership pathways.

Female Genital Mutilation (FGM)

FGM is a severe form of child abuse, a criminal offense, and a violation of human rights. The school equips all staff with targeted training to recognise indicators that FGM has occurred or that a primary-aged pupil is at risk.

Indicators that FGM has occurred:

- **Direct Disclosures:** A pupil confides that a procedure has taken place, or a parent/family member directly discloses the event.
- **Physical Presentation:** A girl shows obvious distress, difficulty walking, or severe discomfort when sitting or standing.
- **Bathroom Routines:** Spending unusually prolonged periods in the toilet due to severe difficulties urinating.

- **Health Complications:** Frequent, unexplained urinary tract infections, severe abdominal pain, or chronic stomach problems.
- **Withdrawal Patterns:** Sudden avoidance of physical exercise, routine avoidance of PE lessons, or a pattern of prolonged, unexplained school absence accompanied by emotional withdrawal or depression.

Risk Factors and Warning Signs (Imminent Risk):

- **Family History:** The family originates from or maintains close ties to a community or country where FGM is traditionally practiced (statistically the highest risk factor).
- **Peer/Sibling Data:** An older sister, cousin, or mother in the family has already undergone the procedure.
- **Verbal Triggers:** A child mentions being taken abroad for a "special holiday," a "prolonged family event," or a specific ritual to "become a woman."
- **Medical Indicators:** Sections are found systematically blanked out or missing from the child's personal health record ("Red Book"), or parents are found seeking travel vaccinations or anti-malarial medication for a sudden, unannounced trip abroad.

Forced Marriage

A forced marriage is a marriage entered into without the full, free, and informed consent of one or both parties, where psychological coercion, emotional blackmail, physical threats, or direct violence are deployed.

- **Absolute Under-18 Legal Prohibition:** Under UK law, it is a strict criminal offense to cause a child under the age of 18 to marry under any circumstances. This applies even if no physical violence, overt threats, or active coercion are identified; a child cannot legally consent to marriage.
- **The "One Chance" Rule:** Staff must understand the "One Chance" rule. The school may only get a single opportunity to speak with a potential victim, log a digital alert, or coordinate with external agencies before a child is removed from the jurisdiction. Immediate, decisive action is mandatory.

Forced Marriage Action Required:

1. **Secure Interview:** If a staff member suspects an imminent risk of forced marriage, they will immediately escort the pupil to a secure, private room to speak with them calmly, away from peers and family members.
2. **DSL Escalation:** The concern must be recorded immediately on **CPOMS** and handed to the DSL.
3. **Multi-Agency Activation:** The DSL will bypass any parental consultation, as informing parents in an HBA context can place the child in immediate physical danger, and activate local child protection tracks.
4. **National Advisory Route:** The DSL will immediately contact the government's central **Forced Marriage Unit (FMU)** on **020 7008 0151** (or email fmufco.gov.uk) to secure emergency legal protection orders and arrange targeted mental health, counseling, and Education Welfare support.

Preventing Radicalisation and Extremism

We hold a statutory duty under the Counter-Terrorism and Security Act 2015 to prevent children from being drawn into terrorism or supporting extremist ideologies. Staff must treat radicalization with the same level of professional urgency as any other form of safeguarding abuse or exploitation.

Statutory Definitions

- **Radicalisation:** The process by which an individual is groomed, manipulated, or influenced to legitimise, support, or engage in terrorist violence.
- **Extremism:** The promotion or advancement of an ideology based on violence, hatred, or intolerance. It aims to destroy the fundamental rights and freedoms of others, undermine and replace the UK's system of

liberal parliamentary democracy, or intentionally create a permissive environment for others to achieve these goals.

- **Terrorism:** An action designed to influence the government or intimidate the public for a political, religious, racial, or ideological cause. It involves serious violence against people, severe damage to property, or the deliberate disruption of vital electronic and cyber systems.

Risk Assessment and Digital Protections

- **Localised Risk Audits:** The school maintains a living Prevent Risk Assessment. This framework is co-authored with local safeguarding partners, local authority Prevent teams, and regional police forces to map out localized extreme-right, Islamist, or mixed-ideology recruitment threats.
- **Active Filtering and Monitoring:** The school operates real-time, automated technical filters across all school devices and networks. Staff are trained to spot and report if a pupil attempts to bypass security boundaries (such as using unauthorized VPNs) to access restricted digital content.
- **Modern Platform Vulnerabilities:** Staff must recognize that radicalization increasingly occurs through primary-friendly spaces, including multiplayer gaming lobbies, chat channels, and algorithmic video feeds (such as TikTok or YouTube Shorts). Perpetrators frequently use gamified extremist content, conspiracy-driven memes, or generative AI media to influence young minds.

Primary-Aged Behavioral Indicators

There is no single profile for a child susceptible to radicalisation, and the process can happen rapidly or over several months. While some indicators can overlap with general emotional distress or changes in childhood development, staff must maintain professional curiosity regarding the following warning signs (*Prevent training for all staff is run on a 2 year rolling programme*):

- **Social Isolation:** Suddenly dropping long-term friendship groups, rejecting activities they previously loved, or isolating themselves from family and peers.
- **Algorithmic Secretiveness:** Showing sudden anxiety, intense secrecy, or defensive behavior regarding their internet use and device screens.
- **Ideological Scripting:** Speaking as if reading from a political or religious scripted speech, showing an inability to debate or discuss their views, or demonstrating a sudden, disrespectful attitude toward staff and peers.
- **Intolerance and Anger:** Refusing to engage with, or becoming verbally or physically abusive toward, peers who have different backgrounds, faiths, genders, or cultures.
- **Conspiratorial Thinking:** Expressing a sudden obsession with online conspiracy theories, intense feelings of persecution, or a desire for retribution.
- **Extremist Material:** Accessing, possessing, or sharing extremist literature, symbols, or media online, or expressing sympathy for the violent actions of radical groups.

Children with low self-esteem, those experiencing family breakdowns, or victims of bullying and discrimination are often more vulnerable to online groomers who promise them a sense of identity, power, and belonging.

Response and Referral

- **Internal Reporting:** If a staff member notices a concerning shift in behaviour or a digital alert is triggered, they must log the information immediately on **CPOMS** and inform the DSL on the same working day. Staff must never delay reporting out of fear of being wrong or stigmatizing a family.
- **Multi-Agency Screening:** The DSL will evaluate the concern. If the child is deemed at risk of radicalization, the DSL will bypass internal channels and file a formal referral to the local authority **Prevent Team** or the multi-agency team.
- **Immediate Threat Escalation:** If a pupil is found in possession of an active weapon, expresses an immediate intent to commit a violent act, or indicates they are in direct contact with an active terrorist recruiter, the DSL will bypass standard screening and contact the **Police** immediately.

Child-on-Child Sexual violence and Sexual harassment

We enforce a strict zero-tolerance stance toward any form of sexual violence or sexual harassment. Staff must never dismiss these actions as "playful banter," "peer-group rites of passage," or an inevitable part of growing up. Tolerating or minimizing lower-level boundaries normalizes a culture of abuse.

Formats and Venues of Abuse

Sexual violence and sexual harassment can manifest:

- **Across All Demographics:** Between two children of any age, gender, or biological sex.
- **As Group Exploitation:** Through a group or gang of children targeting a single child or a smaller group.
- **Across Dual Environments:** Face-to-face (verbally and physically) and through online channels simultaneously.
- **As a Continuum:** These behaviours exist on a continuum where unchecked harassment regularly escalates into severe sexual violence.

Impact and Immediate Victim Care

Victims of peer-targeted sexual harm experience severe, acute distress that directly damages their emotional health and academic progression. This impact is intensified when the perpetrator remains in the same classroom or playground environment.

If a pupil discloses an incident, staff must execute immediate protective actions:

- **Reassurance:** Reassure the victim that they are safe, taken seriously, and are not "creating a problem" by reporting.
- **Shame Erasure:** Staff must actively ensure the victim is never made to feel isolated, responsible, or ashamed for making a report.
- **Non-Criminalisation:** Reassure young children that child protection frameworks are built to support and protect them, not to default to criminalisation.

Vulnerability Mapping and Preventative Oversight

Staff must maintain a high state of vigilance for children statistically at greater risk of sexual violence and harassment. This includes girls, pupils with Special Educational Needs and Disabilities (SEND), and children who are or are perceived to be lesbian, gay, bisexual, or gender questioning.

To maintain an unyielding safety culture, the school will:

- **Intercept Physical Boundaries:** Challenge physical behaviours immediately—such as bottom/breast grabbing, pulling down trousers, bra-flicking, or skirt-lifting. Every instance must be logged on **CPOMS** to track behavioural baselines.
- **Perform Cultural Audits:** Evaluate if wider institutional weaknesses or unsupervised playground zones are enabling peer harassment to occur undetected.
- **Audit Digital Harms:** Monitor closed messaging groups and school networks for signs of digital sexual harassment, including the distribution of youth-produced sexual imagery or the malicious use of generative AI tools to create humiliating deepfake images of peers.

Serious Violence and Criminal Networks

Primary school children are increasingly targeted by external criminal networks seeking to exploit their legal status as minors. Staff must understand that early intervention is vital to disrupt grooming before a child becomes entrenched in violent crime or gang structures.

Elevated Risk Factors

While any child can be targeted, statistical data indicates that the likelihood of a child being drawn into serious violence increases significantly for those who are:

- Male.
- Subject to persistent, unexplained school absences or historical exclusions.
- Victims of documented domestic adversity, child maltreatment, or severe neglect.
- Already displaying anti-social behaviors, minor retail theft, or weapon carrying.

Behavioural and Physical Indicators Checklist

Staff must treat the following indicators as high-priority red flags and report them to the DSL immediately on the same working day:

[Attendance Tracking] —> Sudden, unexplained drops or patterns of routine absence.

[Relational Shifts] —> New associations with older teenagers or external adult groups.

[Academic Profiling] —> A rapid, uncharacteristic collapse in learning and focus.

[Physical Injuries] —> Unexplained cuts, bruising, defensive marks, or signs of assault.

[Emotional Trauma] —> Sudden spikes in self-harm, intense paranoia, or hyper-vigilance.

[Unexplained Wealth] —> Possessing new phones, designer clothes, cash, or gaming credits.

Multi-Agency Escalation Pathway

When a concern regarding serious violence or weapon carrying is logged, the DSL will immediately trigger local multi-agency safeguarding partnership tracks. If a pupil is found in possession of an active bladed article or weapon on school premises, or if there is an imminent threat of violence in the community, the school will bypass standard waiting periods and contact the **Police** immediately.

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

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

Visitor Safeguarding and Identity Checks

We enforce physical and digital identity controls on our premises to protect the school community from external safety and ideological threats.

Non-Collection of Children Protocols

The school operates a structured emergency process to protect children left on school premises after standard end of day hours.

Immediate Actions and Care Timelines

- **Initial Supervision:** Children who are not collected at the end of the school day will be escorted safely to the school office. Staff will immediately attempt to contact the parents or primary carers using the numbers provided.
- **Extended Care Placement:** If a child remains uncollected by **3:30 pm**, they will be transferred to our regulated After School Club provision to ensure appropriate staff ratios and safety supervision. A standard care charge will be billed to the parents or carers for this placement.

- **Contact Escalation:** Staff will continuously call every emergency contact listed on the child's Data Collection Sheet in order of priority.

Statutory Multi-Agency Referrals

- **Children's Social Care Referral:** If **one hour** has elapsed since dismissal, no contact has been established with any authorised caregiver, and no reasonable explanation has been received, the DSL will make an immediate threshold referral to **Gloucestershire Children's Social Care Services**. This alert formally requests that local authority teams secure emergency accommodation for the child.
- **Known Open Cases:** If the uncollected child is already an active Child in Need (CiN) or subject to a Child Protection (CP) plan, staff will bypass the standard one-hour waiting period and notify their allocated social worker immediately.
- **Police Escalation:** If emergency contact cannot be established with Children's Social Care after hours, the DSL will contact Gloucestershire Police directly to hand over care.

Post-Incident Records and Family Communications

- **Written Notifications:** If a child is taken into emergency local authority care, Kingsholm C of E Primary School and Nursery will send a formal notification letter to the family's registered home address within 24 hours. This letter will provide the direct contact numbers and address for the corresponding Children's Social Care team.
- **CPOMS Documentation:** A comprehensive, timeline-based entry must be logged on the child's secure **CPOMS** file before the end of the working day. This entry must detail all phone logs, parent interactions, rationales, and the outcome of the incident.

Missing and Absconding Pupils Process

Our procedures are designed to find any missing or absconding child quickly and return them to effective supervision.

Immediate Response Sequence

1. **DSL Notification:** The moment a staff member identifies that a pupil is missing from a class, line, or activity, they must notify the DSL and the school office immediately.
2. **Immediate Site Search:** Available staff will execute a coordinated sweep of the school buildings, grounds, and perimeter gates while maintaining standard classroom supervision ratios.
3. **Parental Contact:** The school office will contact the child's parents or primary carers immediately to check if the child has returned home or if there is an alternative explanation.
4. **Police Notification:** If a rapid internal search fails to locate the pupil, the school will contact the **Police** immediately.

Vulnerability and Dynamic Risk Assessments

The DSL and the class teacher will perform a dynamic risk assessment to determine if the police need to be notified earlier. Staff do not need to wait for a site search to finish if the child belongs to a high-risk category. This risk assessment evaluates:

- The child's age, developmental stage, and Special Educational Needs or Disabilities (SEND).
- Active mental health challenges, emotional distress, or past trauma.
- Known legal or care status vulnerabilities (such as Looked-After status).
- Immediate environmental risks (such as extreme weather or proximity to busy roads/waterways).

Standard Police Information Package

When reporting a missing child to the police, the school will provide the following structured data package:

- **Personal Data:** Full name, date of birth, legal care status, and name of the responsible local authority (if applicable).
- **Incident Details:** The exact time and location the child was last seen, plus the circumstances, triggers, or events leading up to their disappearance.
- **Physical Description:** A description of what the child was wearing, any personal belongings they had, a recent high-resolution photograph from our management information system, and their mobile number (if they have a phone).
- **Historical Data:** Any known history of running away, previous missing episodes, and names or addresses of close local friends, family members, or associates.
- **Medical Details:** Relevant medical history, severe allergies, or mandatory medication schedules.
- **Safeguarding Contact:** Direct contact details for the DSL, including emergency out-of-hours contact channels.

Recovery Resolution Options

While the search is underway, the school will follow all instructions from the police. Once the child is found, the school will execute one of the following compliance pathways:

[Child Returns Prior to Police Arrival]

└ School immediately notifies the Police to cancel the dispatch —> DSL initiates a CPOMS entry and follows local internal review protocols.

[Child Returns to School Individually]

└ School immediately notifies the Police —> DSL coordinates a supportive return conversation with the pupil to understand the trigger.

[Police Locate and Return the Child]

└ Police conduct a formal Safe and Well Interview —> School team participates as requested, logs the report, and updates care plans.

Proactive Missing Risk Assessments

Any pupil with a documented history or known vulnerability of running away or absconding will have an individual, written **Missing Pupil Risk Assessment and Safety Plan**. This plan is co-authored by the DSL, Special Educational Needs Coordinator (SENCO), and parents. It maps out localized environmental triggers, immediate physical containment strategies, and specific staff monitoring assignments.

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