



Child Protection Policy

September 2025

Last reviewed: September 2025

Next review date due by: September 2026

This applies to the whole school including the Early Years Foundation Stage (EYFS).

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Important Contacts

Role/Organisation	Name	Contact Details
Headteacher	Mr Caig Wardle	01980 632387 head@avondaleschool.org
Designated Safeguarding Lead (DSL)	Mrs Amy Worley	01980 632387 amy@avondaleschool.org
Deputy Designation Safeguarding Lead (DDSL)	Mr Craig Wardle	01980 632387 georgina@avondaleschool.org
Proprietor	Mr David Allison	01980 632387 david@avondaleschool.org
Local Authority Designated Officer (LADO)		0300 456 0108 & selecting Option 6 LADO@wiltshire.gov.uk
Social Work Standby Service		0300 456 0100 <i>Only available outside of office hours.</i> <i>In an emergency, contact 999.</i>
MASH (Multi-agency Safeguarding Hub)		0300 456 0108 <i>Available only during office hours.</i> Integratedfrontdoor@wiltshire.gov.uk <i>In an emergency, contact 999.</i>
SVPP helpline		0300 456 0108
Channel Helpline		01278 647466
MASH Professional Consultation Line		0300 456 0108
The Early Help Unit (Wiltshire)		0300 456 0108

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare (including the management of concerns which do not meet the harm threshold as we understand the early intervention is crucial)
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

Avondale Preparatory is committed to acting in the best interests of the child at all times and to enable children to have the best outcomes.

The school recognises the importance of providing an ethos and environment that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

All members of staff at Avondale Preparatory School understand that we have a zero-tolerance approach to abuse. Training undertaken by all members of staff ensures that they understand the vital role they play in preventing abuse.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education\(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and The Independent School Standards Guidance for independent schools. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of children at the school.

- Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking

positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- RSHE (2019)

We will follow the procedures in line with the locally agreed Multi Agency Safeguarding Arrangements set out by the Wiltshire Safeguarding Vulnerable People Partnership (SVPP WILTSHIRE) and take account of guidance issued by the DfE in Keeping Children Safe in Education 2025 to:

- Ensure we have a Senior Designated Safeguarding Lead (DSL), who is a member of the school leadership team, and a Deputy Safeguarding Lead for child protection/safeguarding who has received appropriate training and support for this role.
- The Designated Safeguarding Lead role is written into their job description and clarifies the role and responsibilities included (as defined in KCSIE 2025 Annex C).
- Ensure that we have a Designated Teacher for Looked After children.
- Ensure every member of staff (including temporary, supply staff and volunteers) and the proprietor knows the name of the Senior Designated Safeguarding Lead, their deputies responsible for child protection, and their role.

- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead, or to children's social care/police if a child is in immediate danger.
- Ensure all staff and volunteers are aware of the early help assessment process and understand their role in making referrals or contributing to early help assessment offers and arrangements.
- Ensure that there is a whistleblowing policy and culture where staff can raise concerns about unsafe practice, and that these concerns will be taken seriously.
- Ensure that there is a complaints system in place for children and families.
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection and safeguarding by setting out its obligations in the school prospectus and on the school's website.
- Notify Children's Social Care if there is an unexplained absence for a child who is subject to a child protection plan and where no contact can be established with the child or a parent or appropriate adult linked to the child.
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at child protection conferences.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately; documenting and collating information on individual children to support early identification, referral and actions to safeguard.
- Ensure all records are kept securely; The school uses Impero Backdrop system for reporting and maintaining safeguarding records.
- Ensure that we follow robust processes to respond when children are missing from education or missing from home or care.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer. Ensure safe recruitment practices are always followed.
- Apply confidentiality appropriately.

- Apply the SVPP Wiltshire escalation procedures if there are any concerns about the actions or inaction of social care staff or staff from other agencies.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to 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 online.

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

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

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

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

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

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We take positive action to deal with disadvantages these pupils face including offering reasonable adjustments. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education or absent for prolonged periods and/or repeat occasions
- Whose parent/carers has expressed an intention to remove them from the school to be educated at home
- Who identify as part of the LGBTQ+ community

5. Roles and responsibilities

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

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

- Behaviour Policy
- Pastoral support system

- Planned programme of relationships and health education (RHE), which is inclusive and delivered regularly, tackling such issues as:
 - o Healthy and respectful relationships
 - o Stereotyping, prejudice and equality
 - o Self-esteem

5.1 All Staff

All staff will:

- be given, read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (2025), and review this guidance at least annually. A copy will always be available in the DSL safeguarding file for reference.
- DSLs, SLT and staff who work directly with children will be given, read and understand annex B of KCSIE 2025 which contains important additional information about specific forms of abuse and safeguarding issues. All staff will sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

Staff working with children at Avondale Preparatory School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, including the sections which detail online safety, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, and the safeguarding response to children who go missing from education.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation, indicators of being at risk from or involved with serious violent crime (including that linked to county lines), FGM and radicalisation.
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in preventing harm.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.
- What to look for to identify children who need help or protection.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Mrs Amy Worley who is the Inclusion Lead. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

Out of school hours the DSL can be contacted by email: office@avondaleschool.org or amy@avondaleschool.org.

When the DSL is absent, the deputy DSL – Mrs Georgina Barrington-Tolan – will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of filtering and monitoring systems and processed in place at our school.

The DSL will also:

- Keep the co-headteachers informed of any issues.
- Keep the proprietor informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and deputy are set out in their job description and training is updated at least every two years.

5.3 The Proprietor

The proprietor will:

- Read Keeping Children Safe in Education.
- Undertake a strategic leadership responsibility for the school's safeguarding arrangements and comply with their duties under legislation. They have oversight of this guidance, ensuring policies, procedures and training are effective and always comply with the law.
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring that it complies with the law.
- Monitor the effectiveness of this policy.

- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that they facilitate a whole school approach to safeguarding. They ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. This is ensured through regular contact between the proprietor, co-headteachers and DSL and also through termly written reports and formal meetings. The proprietor attends the setting regularly and oversees safeguarding training within school.
- Undertake a full annual review of this policy and its procedures, inclusive of the implementation and efficiency with which the related duties have been discharged. The Proprietor recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. As such, staff have the opportunity to contribute to and shape our safeguarding arrangements and child protection policy. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed policy and either a hard- or electronic copy will be made available to them. The policy is approved by the proprietor after every update is made.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 1. Making sure that the leadership team and staff are aware of provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 2. Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

The LADO will act as the 'case manager' in the event that an allegation of abuse is made against the co-headteachers or the proprietor, where appropriate (see appendix 3).

The DSL undertakes an annual review of safeguarding with the co-headteachers which is then reported and discussed with the proprietor. The proprietor approves this report annually.

The proprietor, with the co-headteachers and DSL scrutinises:

- (a) any safeguarding issues which may have emerged over the course of the year and
- (b) inter-agency co-operation and in particular the school's relationship with the LSCB and Designated Officer(s); and (ii) a review of written evidence including
 - (i) written reports prepared by the DSL;
 - (ii) training records of all staff (including the DSL/Deputy DSL); and
 - (iii) records of any safeguarding
- (c) conversations and referrals between the school and external agencies.

The school complies with any requests for self-assessment from the SVPP WILTSHIRE which is overseen by the proprietor.

5.4 The Co-Headteachers

The Co-Headteachers are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Ensuring that staff (including temporary staff) and volunteers understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents when their child joins the school and via the school website.

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding, online safety and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Ensuring the relevant staffing ratios are met, where applicable.
- Oversee the safe use of technology, mobile phones and cameras in the Early Years Foundation Stage department.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

6. Confidentiality

Confidentiality, and an ethos where staff, parents/carers and children feel that they may speak openly without fear of breach of confidentiality, beyond that which is necessary in order to effectively safeguard children, is of utmost importance at Avondale Preparatory School. As such, we recognise that:

- Timely information sharing is essential to effective safeguarding.
- The school has a duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children (KCSIE 2025).
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it

cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
 - o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
 - o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
 - o The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk).
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10 years, if the alleged perpetrator is under 10 years of age, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
 - o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
 - o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved.

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- The co-headteachers and DSL will disclose relevant safeguarding information about a child with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

Confidentiality is also addressed in this policy with respect to record-keeping in section 15 and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled.
- Has special educational needs (whether or not they have a statutory education, health and care (EHC) plan).
- Is a young carer.
- Is bereaved.

- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organized crime groups and/or serious violence, including knife crime.
- Is frequently missing/goes missing from education, care or home.
- Is at risk of modern slavery, trafficking and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Is viewing problematic and/or appropriate content online (for example, linked to violence) or developing inappropriate relationships online.
- Is misusing drugs or alcohol.
- Is suffering from mental ill health.
- Has returned home to their family from care.
- Is at risk of so-called ‘honour’-based abuse, such a female genital mutilation (FGM) or forced marriage.
- Is a privately fostered child.
- Has a parent or carer in custody or is affected by parental offending.
- Is missing education, or persistently absent from school, or not in receipt of full-time education.
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

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

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

Avondale Preparatory School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to the or, more rarely, by others.

Avondale Preparatory School recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours. This could include parents who are under the influence of drugs or alcohol or the indication that there is a sudden change in their mental health.

Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

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

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

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

<https://www.wiltshire.gov.uk/children-young-people-protection>

7.2 If a child makes a disclosure to you

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

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

- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

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

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

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

Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

1. Is informed by a girl under 18 that an act of FGM has been carried out on her; or

2. Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth,

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

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

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

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

Any member of staff who suspects a child is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

For referral, consent from parents/carers is not necessary and should not be sought before referral.

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

If you have any concerns about a child's welfare, where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC

helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

For referral, consent from parents/carers is not necessary and should not be sought before referral.

Early Help Assessment

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

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

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

Early Help Assessments are requested by completion of an Early Help Assessment Form, which can be found on the local authority website. <https://www.wiltshire.gov.uk/children-young-people-access>

Alternatively, an early help assessment is sometimes suggested by the Multi Agency Safeguarding Hub as the result of a social care referral.

Wiltshire Safeguarding Thresholds Guidance - for children and families in need of help and support

The threshold for accessing support and service, Wiltshire Safeguarding Thresholds Guidance - for children and families in need of help and support, version 2.0 was updated in

2023. The purpose of the threshold guidance handbook is to support practitioners to identify an individual child's, young person's and /or family's level of need and to enable the most appropriate referrals to access provision.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

For referral, consent from parents/carers is not necessary and should not be sought before referral.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

In Wiltshire, referrals should be made to the MASH (Wiltshire Multi-Agency Safeguarding Hub). If a referrer is unhappy with the handling of a child's case by Children's Social Care or other agencies, they should escalate this through the SVPP WILTSHIRE escalation process.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. For referral, consent from parents/carers is not necessary and should not be sought before referral.

If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice

from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

The Department for Education also has a dedicated telephone helpline (020 7340 7264) which school staff can call to raise concerns about extremism with respect to a child. You can also email counter.extremism@education.gov.uk.

Note that this is not for use in emergency situations.

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

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

7.6 If you have a concern about mental health

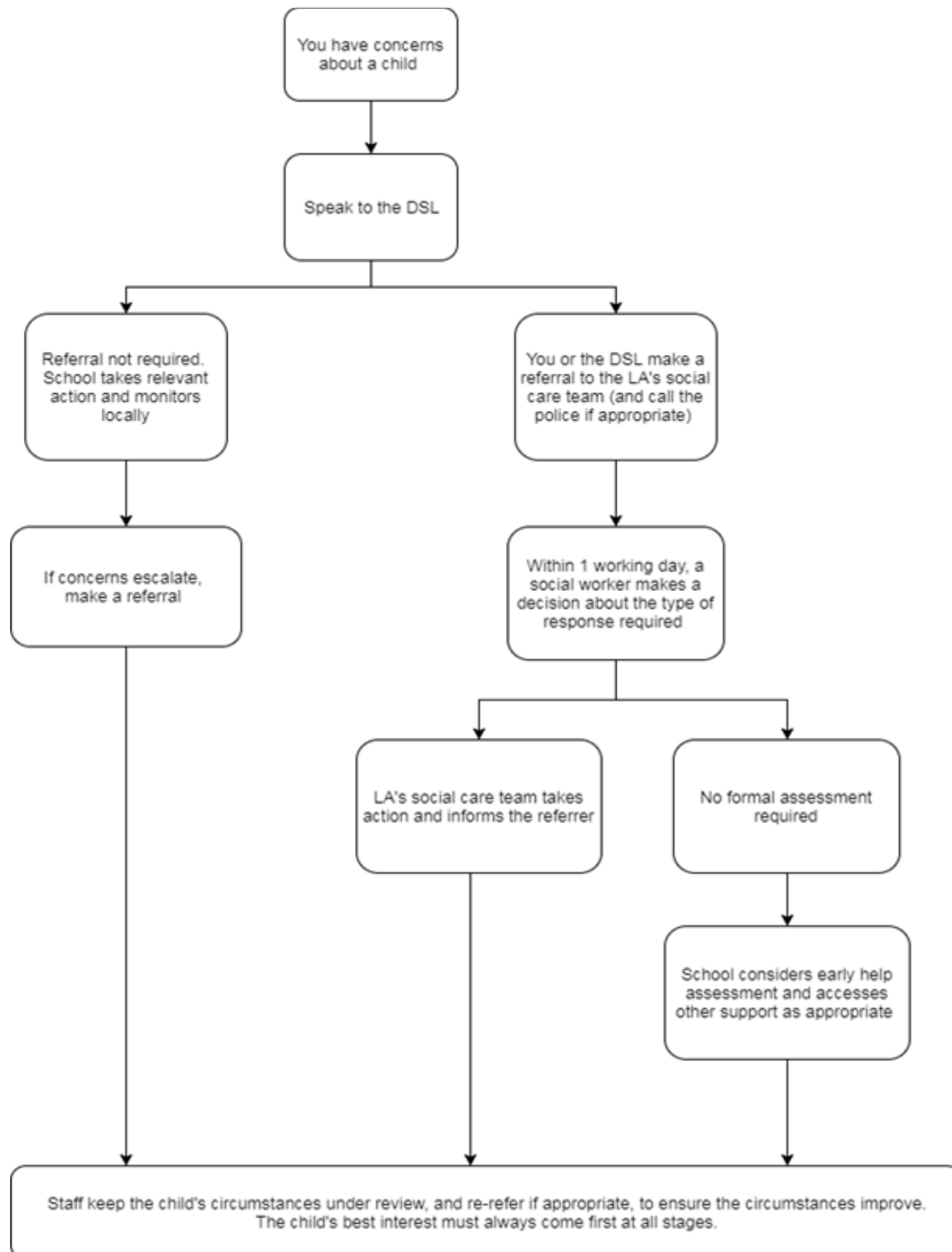
Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Figure 1. Reporting pathway for all staff members for concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the co-headteachers as soon as possible. The co-headteachers will then follow the procedures set out in Appendix 3, if appropriate. If the concerns/allegations are about the headteacher speak to the proprietor, or about the proprietor, speak to the LADO directly. The co-heads/proprietor should not be informed before making contact with the LADO.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation. Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 3 for more detail).

7.8 Allegations of abuse made against other children

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

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

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

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

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

If a pupil makes an allegation against another pupils:

- You must record the allegation and tell the DSL, but **do not** investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the child and adolescent mental health services (CAMHS) if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting the children and/or taking any disciplinary measures against the alleged perpetrator(s). We will ask the police if we have any questions about the investigation.

All incidences of Child-on-Child abuse must be recorded on Imperio Backdrop and brought to the attention of the DSL as soon as is practical.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualized language or inappropriate behaviour between peers including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualized or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (see section 7.10).
- Ensure staff reassure victims that they are believed and are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

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

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

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

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

7.9 Sharing of nudes and semi-nudes (sexting)

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer generated images that otherwise appear to be a photograph or a video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident, and reassure the child(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any child in the images or videos is under 13.
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

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

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the children involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling 101 (the non-emergency police number) or 999 if the incident is an emergency. If, following a referral, the police need to speak to the child whilst at school, the school will ensure that the child is

accompanied by an appropriate adult, who will offer support, advice and assistance whilst ensuring that the child's rights and entitlements are respected.

Recording incidents

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

7.10 Reporting systems for our children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

- Put systems in place for children to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children.
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Ensure that children know they can report any concerns to their class teacher, any other adult working at school or any of SLT.
- Ensure that children are made aware of the reporting systems and processes through discussion in our relationship education curriculum
- Ensure that children will be reassured following disclosures and their wishes will be taken into account. They will always be made to feel comfortable.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Our online safety policy is reviewed and updated on an annual basis and the procedures and implementation are reviewed regularly.

Please refer to our Online Safety and Mobile phone use policies for more detail.

The school aims to:

- Have robust processes in place to ensure the online safety of children, staff and volunteers.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as mobile phones).
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanism to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm. Suicide, anti-Semitism, radicalization and extremism.

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. Consensual and non-consensual

sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

- Educate children about online safety as part of our curriculum, including:
 - o the safe use of social media, the internet and technology
 - o keeping personal information private
 - o how to recognise unacceptable behaviour online
 - o how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our safe internet use policy. We will share procedures with them so they know how to raise concerns about online safety, including sharing the systems we use to filter and monitor online use in school; explaining what children are being asked to do online when at school and who (if anyone) their child is going to be interacting with online.
- Make sure staff are aware of any restrictions placed on them with regards to use of their mobile phones:
 - o staff in the main school are allowed to bring their mobile phones to school with them but they must be stored safely out of sight and reach of children and only used when pupils are not present in the room and are not likely to enter the room whilst they are being used. Staff may use the staff room for private use of mobile phones.
 - o staff will not take pictures or recordings of pupils on their personal phones or cameras.

- staff in EYFS will not take personal mobile phones or cameras into the Early Years Foundation Stage department. They will store their phones outside of the department, in the Tots Kitchen cupboard. Phones may be used on breaks in designated staff areas.
- Make all children, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a child is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, children and parents/carers are aware that staff have the power to search children's phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Regularly review for effectiveness the filtering and monitoring systems in use.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that consider and reflects the risks faced by our school community.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

8.1 Artificial Intelligence

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Avondale Preparatory School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also

have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of ‘deepfakes’, where AI is used to create images, audio or video hoaxes that look real.

Avondale Preparatory School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policies.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school’s requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education. Where staff have concerns about the use of AI, including safeguarding concerns, this should be shared with the DSL, deputy DSL and/or headteacher if the concern does not relate to safeguarding.

9. Notifying parents or carers

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

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

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

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

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

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

10. Children with special educational needs, disabilities or health issues

We recognise that children with special educational needs and disabilities (SEND), certain health conditions and disabilities can face additional safeguarding challenges. Statistically, they are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children being more prone to peer group isolation or bullying than other children, including prejudice-based bullying
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as child-on-child abuse, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

We offer extra pastoral support for children with SEN and disabilities: children may be included in nurture groups according to need and key stage. Their IEPs, My Support plans, EHCPs or behaviour plans may also identify specific areas of pastoral support that they may require.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCO.

11. Children with a social worker

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

- The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about:
 - o Responding to unauthorised absence or missing education where there are known safeguarding risks.
 - o The provision of pastoral and/or academic support.
- Liaising with the School Co-Headteachers about the child's education.

12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.
- The DSL and DDSL maintain a key role in raising awareness amongst staff about the needs of children who have or who have had a social worker and the barriers that these

children might experience in respect of attendance, engagement and achievement at school.

We have appointed an appropriately trained teacher, to take the lead on promoting the educational achievement of looked-after and previously looked-after children (Mrs Amy Worley).

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with Co-Head Teachers to promote the educational achievement of looked-after and previously looked-after children.
- Where the school believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled, is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

13. Pupils who are lesbian, gay, bisexual or gender questioning

Please note – the section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. Our PSHCE curriculum covers tolerance of LGBTQ+ children through the 1Decision programme.

We also recognised that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Pupils who seek this support will be offered pastoral support on an individualised basis, coordinated by the Senior Mental Health lead (Mrs Amy Worley).

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying. Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

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

14.2 Other complaints

All complaints arising from the operation of this policy will be considered under the School's complaints procedure, with reference to the school's Designated Safeguarding Lead (DSL) and the NCC Safeguarding Children's Partnership.

14.3 Whistleblowing

Our whistleblowing policy is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our school, a positive safeguarding culture. See the school's whistleblowing policy for more details.

15. Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Any concerns about a child will be recorded in writing within 24 hours. All records will provide a factual and evidence-based account and there will be accurate recording of any actions. Records will be signed, dated and, where appropriate, witnessed. Where an opinion or professional judgement is recorded this should be clearly stated as such. A copy will be uploaded to the secure Impero Backdrop site and the original passed to the DSL who will file it in the relevant Child Protection file.

At no time should an individual teacher/member of staff or school be asked to or consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures. The body map below should be used in accordance with recording guidance.

Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the child's social worker if already an open case to social care.

A chronology will be kept in the main school file and on Impero Backdrop prior to the commencement of a concern file.

Staff, particularly pastoral staff, will record any minor concerns on the chronology on Impero Backdrop and will take responsibility for alerting the Designated Safeguarding Lead should the number of concerns rise or, in their professional judgement, become significant. The Impero Backdrop secure site will send an automatic email to the DSL when a new item is added.

Why recording is important

Our staff will be encouraged to understand why it is important that recording is comprehensive and accurate and what the messages are from serious case reviews are in terms of recording and sharing information. It is often when a chronology of information is pieced together that the level of concern escalates or the whole or wider picture becomes known. We acknowledge, without information being recorded, it can be lost. This could be crucial information, the importance of which is not always necessarily apparent at the time. On occasions, this information could be crucial evidence to safeguard a child or be evidence in future criminal prosecutions.

The Child Protection (CP), Child in Need (CiN) or Confidential file

The establishment of a 'CP, CiN or Confidential' file, which is separate from the child's main school file, is an important principle in terms of storing and collating information about children which relates to either a child protection or safeguarding concern or an accumulation of concerns about a child's welfare which are outside of the usual range of concerns which relate to ordinary life events. It should be borne in mind that what constitutes a 'concern' for one child may not be a 'concern' for another and the particular child's circumstances and needs will differ (i.e. a child subject to a child protection plan, looked after child, CiN may be looked at differently to a child recently bereaved, parental health issue, etc.). Professional judgement will therefore be an important factor when making this decision and will need clear links between pastoral staff and Designated Safeguarding Leads in school (named designated person).

A 'child protection' or 'confidential' file should be commenced in the event of:

- A referral to MASH/Children's Social Care
- A number of minor concerns on the child's main school file
- Any child open to social care

It is suggested that within a child's 'child protection' or 'confidential' file there is:

- A front sheet
- A chronology
- A record of concern in more detail and body map, where appropriate
- A record of concerns and issues shared by others

The school will keep written records of concerns about children on Impero Backdrop even where there is no need to refer the matter to MASH/Children's Social Care (or similar) immediately. Records will be kept up to date and reviewed regularly by the Designated Safeguarding Lead to evidence and support actions taken by staff in discharging their safeguarding arrangements. Original notes will be retained (but clearly identified as such) as

this is a contemporaneous account; they may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect.

Where children leave the school we will ensure their confidential/child protection file is transferred to the new school or college as soon as possible (this should be within five days of either the child moving to a new school for in-year transfers, or within five days of the new term, in line with KCSIE 2025). This should be transferred separately from the main child file, ensuring secure transit, and a confirmation of receipt should be obtained. It is good practice, wherever possible, for the file to be hand-delivered to the receiving designated safeguarding lead, with a discussion taking place. There should be a smooth and safe transition for the child.

Where the school receives child protection files, the DSL will ensure key staff are made aware of relevant information as required.

Recording Practice

Timely and accurate recording will take place when there are any issues regarding a child. A recording of each and every episode/incident/concern/activity regarding that child, including telephone calls to other professionals, needs to be recorded on the chronology kept within the confidential file and on Impero Backdrop for that child. This will include any contact from other agencies who may wish to discuss concerns relating to a child. Actions will be agreed and roles and responsibility of each agency will be clarified and outcomes recorded.

The chronology will be brief and log activity; the full recording will be on the record of concern.

NB There are templates attached within the appendices, which include a case record, chronology sheet, record of concern disclosure sheet and body maps and guidance.

More detailed recording on the record of concern will be signed and dated and include an analysis, taking account of the holistic needs of the child, and any historical information held on the child's file. Support and advice will be sought from social care, or early help assessment whenever necessary. In this way, a picture can emerge and this will assist in promoting an evidence-based assessment and determining any action(s) that needs to be taken.

This may include no further action, whether an EHAF should be undertaken, or whether a referral should be made to MASH/Children's Social Care in line with the NCC Pathway to Provision Version 9 document (published 2021).

Such robust practice across child protection and in safeguarding and promoting the welfare of children will assist the school in the early identification of any concerns which may prevent future harm.

The Designated Safeguarding Lead will have a systematic means of monitoring children known or thought to be at risk of harm (through the concern file and through an ongoing dialogue with pastoral staff). They will ensure that we contribute to assessments of need and support multi-agency plans for those children.

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

16. Training

16.1 All staff

All staff members will undertake safeguarding, online safety and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. This training will be regularly updated (at least annually) and will be in line with advice from the 3 safeguarding partners. The training will have regard to the Teachers' Standards to support expectations that all teachers:

- manage behaviour effectively to ensure a good and safe environment.
- have a clear understanding of the needs of all pupils.

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

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

All staff will be trained to manage reports of child-on-child sexual violence and sexual harassment; be aware of their role in the early help assessment process and be aware of the process for making referrals to children's social care. Staff will know what to do if children tell them that they are being abused, exploited or neglected and will reassure victims that they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. No victim will ever be made to feel ashamed for making a report.

All contractors will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training at least every two years.

After an allegation has been made or a concern has been raised in relation to a member of staff who works within the school, the DSL and deputy will work together to analyse and identify lessons which can be learned from the case. This will also happen if the allegation is not found to be substantiated.

16.3 Proprietor

The proprietor receives training about safeguarding to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

16.4 Recruitment – interview panels

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

16.5 Staff who have contact with children and families

All staff who have contact with children and families will have training to promote the interests of children and allow for confidential discussions of sensitive issues.

17. Mobile phones and cameras

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

Avondale Preparatory School allows staff to bring in mobile phones for their own personal use. If they need to make an emergency call, they must do so either in the Co-Headteacher's Office, the staff room, the SEN room or outside the school grounds. Staff should provide the school number to family and next of kin so, in an emergency, the member of staff can be contact on the school phone. Mobile phones must not be used to take photographs anywhere within the school grounds. Instead, digital cameras are available and may be used within the consent criteria guidelines. No personal cameras or mobile phones will be used in the EYFS setting.

We will make sure staff are aware of any restrictions placed on them with regards to use of their mobile phones:

- staff in the main school are allowed to bring their mobile phones to school with them but they must be stored safely out of sight and reach of children and only used when pupils are not present in the room and are not likely to enter the room whilst they are being used. Staff may use the staff room or the SEN room for private use of mobile phones.
- staff will not take pictures or recordings of pupils on their personal phones or cameras.
- staff in EYFS will not take personal mobile phones or cameras into the Early Years Foundation Stage department. They will store their phones outside of the department, in the Tots Kitchen. Phones may be used on breaks in designated staff areas.

(Please see out Mobile Phone, Camera and Photograph Policy). We follow guidance in KCSIE 2025 and EYFS 2025.

18. Monitoring arrangements

This policy will be reviewed annually by the DSL. The policy will be updated as needed so that it is kept up to date with safeguarding issues as they emerge and evolve. At every review, it will be approved by the proprietor.

19. Links with other policies

This policy links to the following policies and procedures

- Behaviour
- Child-on-child abuse
- Staff code of conduct
- Complaints
- Health and Safety
- Attendance
- Online safety
- Equality
- Sex and Relationship Education
- First Aid
- Curriculum
- Privacy Notices
- Missing in Education
- Whistleblowing
- Anti-bullying
- IT Acceptable Use
- RSE Policy

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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Appendix 2: safer recruitment and DBS checks – policy and procedure

The Single Central Record

Schools must keep a SCR to evidence they have carried out the range of checks required by law on their staff. All individuals who work in regular contact with children, including volunteers and those employed by third parties (including Teacher Trainees) must be included on the SCR, along with details of all members of the Proprietor Body.

The SCR must contain the following fields:

- Full name of staff member
- Position and Start date
- Identity check
- Qualifications
- Enhanced DBS
- Barred List/List 99
- Right to Work in the UK
- Overseas checks
- References
- Application Form
- Prohibition from Teaching
- EEA Sanctions
- Prohibition from Management check (where appropriate)
- Medical fitness declaration
- Notes

Best practice for all documents copied, dated and signed is to state they are a "copy of the original" so that there is no doubt on record. It also helps if the signature has the name printed underneath for future reference.

The checker must input the following on to the SCR:

- the date the original documentation was seen
- their initials
- the level of clearance as “satisfactory” if it complies with the requirement.
- the clearance level for Right to Work is “Yes”
- for most DBS entries the clearance level is “Enhanced with Barred List”
- where the Barred List check is obtained as part of the DBS check and not as a standalone, the clearance level should be the same as for the DBS
- where the Barred List check is obtained as a standalone check, the clearance level should be “List 99 cleared”
- if there is no requirement to see documentation “N/A” must be entered as no field should be left blank.

Recruitment and selection process

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

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below. We follow relevant guidance in KCSIE 2025 (Part Three Safer Recruitment) and from the Disclosure and Barring Service.

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

Candidates who are shortlisted for a job will be informed that the school will carry out online checks as part of the due diligence process.

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns, including conducting digital screening using the applicants full name and any previous names indicated on their application form as the search terms.

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

- If they have a criminal history.
- Whether they are included on the barred list.
- Whether they are prohibited from teaching.
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
- Any relevant overseas information.

- Sign a declaration confirming the information they have provided is true.

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references.
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

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

- Record all information considered and decisions made.

Pre-appointment vetting checks

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

New staff

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

- Verify their identity.
- Obtain (via the applicant) an DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of this for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the results of the check and the recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

- For all staff, including teaching positions: criminal record checks for overseas applicants.
- For teach positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

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

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children;

- An individual moves from a post that is not regulated activity to one that is; or
- There is a break in service of 12 weeks or more.

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

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe that the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

We will obtain the DBS check for self-employed contractors.

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

The Proprietor

The following checks will be completed for all proprietors:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK.

Appendix 3: allegations of abuse made against staff

When referring to ‘staff’, this term is defined as any adult working in the school setting. Reports about supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified. Where an individual or organisation is using the school premises to run activities for children, we will follow safeguarding procedures and inform the LADO if there is an allegation of an incident.

Section 1: allegations that may meet the harms threshold

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour both in and out of school.

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

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

A 'case manager' will lead any investigation. This will be the Co-Headteachers, or the proprietor where the Co-Headteachers are the subject of the allegation. The LADO will be identified at the earliest opportunity.

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

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

If an allegation is made against the proprietor, refer the immediately to the LADO without informing the proprietor.

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children

- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.

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

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation.

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

False: there is sufficient evidence to disprove the allegation.

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Co-Headteacher will take the following steps:

(In the case of the proprietor being the subject of the allegation, the LADO will take over the investigation)

- Immediately discuss the allegation with the designated officer at the local authority and within one working day. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve

the police and/or children's social care services. (The LADO may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the LADO will notify the designated officer as soon as practicably possible after contacting the police).

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the LADO will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The individual may want to ask colleagues for advice or they may wish to seek medical or mental health advice from their doctor.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The LADO will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

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

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

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

Additional considerations for supply staff

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

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

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

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality and information sharing

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

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

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

Record-keeping

The LADO will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found

to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). Such records will include:

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

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

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated.

- We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Non-recent allegations

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

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

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

Section 2: Allegations that do not meet the harm threshold

These are known as 'low-level' concerns. Concerns about staff may arise in several ways and from a number of sources. As part of our safeguarding procedures, we have an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. Any allegations of low-level concerns should be made to the Co-Headteachers. Any concerns or allegations of low-level concerns about the Co-Headteachers or the Proprietor should be made directly to the LADO.

Low-level does not mean that the concern is insignificant, it means the behaviour does not reach the threshold detailed above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is important to share any concerns. Staff are also encouraged to self-refer if they ever find themselves in a situation that could be misinterpreted, might appear compromising to others or if on reflection they believe they behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing. They will contain the details of the concern, the context in which the concern arose and any action taken. The name of the individual sharing the concerns should also be noted. The records will be kept confidentially and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The Co-Headteachers will respond directly to the person who made the concern, having collected as much evidence as possible.

Sharing low-level concerns

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

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

Responding to low-level concerns

If the concern is raised via a third party, the Co-Headteachers will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.
- The Co-Headteachers will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct.

We will also consider whether any wider cultural issues in the school enabled the behaviour to occur, and if appropriate policies should be revised or extra training delivered to minimise the risk of recurrence.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

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

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

Appendix 4: specific safeguarding issues

1: Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety advice for education settings.

All adult involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from the child or young person using online platforms.

To make initial contact, the offender may present as themselves, or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family of the young person.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person.
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images.
- Moving from a public to a private/E2EE platform.
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.

- Offered something of value (or of value to the child/young person) such as money or gaming credits.
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes or a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organized crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them.
- Use images that have been stolen from the child or young person through hacking their account.
- Use digitally manipulated images, including AI-generated images, of the child or young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can involve the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person.
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first.
- Moved from a public to a private/E2EE platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

2: Children who are absent from education

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

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

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care.
- Are supervised by the youth justice system.

- Cease to attend a school.
- Come from new migrant families.

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

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

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

3: Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly absent from school or education.
- Not taking part in education.

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

4: Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. CSE can affect children, both male and female, and can include children who

have been moved for the purpose of exploitation. It may, or may not, be accompanied by threats of violence.

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

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

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

Indicators of sexual exploitation can include a child:

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

5: Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. Domestic abuse can be psychological, physical, sexual, financial or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (the DSL), where possible before the children arrive in school the next day. The DSL will provide support according to the child's needs and update records about their circumstances.

6: Serious Violence and Sexual Harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.

- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face-to-face (both physically and verbally).

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of:

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

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

All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.

The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

7: Cybercrime

Avondale Preparatory School recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' crime.

If staff are concerned that a child may be at risk of becoming involved in cybercrime, the DSL will be informed and the situation dealt with in accordance with our child protection and IT use policy.

8: Homelessness

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

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

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

9: So-called 'honour-based' violence (including FGM and forced marriage)

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

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

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

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

10: FGM

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

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

Indicators that FGM has already occurred include:

- A child confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/child already being known to social services in relation to other safeguarding issues.

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable.
- Finding it hard to sit still for long periods of time (where this was not a problem previously).
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or de-pression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practiced in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having a limited level of integration within UK society.
- Confiding in a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
- Being unexpectedly absent from school.
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

11: Forced marriage

Forcing a person into marriage is a crime. It is illegal to cause a person under the age of 18 to marry, even if violence, threats or coercion are not used. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

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

12: Child Abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important that they are given practical advice on how to keep themselves safe. The focus is on building children's confidence and abilities rather than simply warning them about all strangers.

13: Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The government has created booklets which the school will use to support any children in this situation.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be a stressful time for children and should be considered by all staff working with the child.

14: Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should do everything they can to mitigate negative consequences for those children.

15: County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools.

Children are also increasingly targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of indicators for CSE and CCE as detailed above may be applicable where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been victim or perpetrator of serious violence
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing

16: Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information can be found through the Modern Slavery Statutory Guidance.

17: Preventing radicalisation

Radicalisation refers to the process or a person legitimising support for, or use of, terrorist violence.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy or democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property;
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Avondale Preparatory School is aware of our duty under section 26 of the Counter Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn

into terrorism', also known as the Prevent duty and the specific obligations placed upon us as an education provider.

Schools have a duty to prevent children from becoming involved with or terrorism. All staff will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

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

Staff will be alert to changes in children's behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.

- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

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

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

17: Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

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

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

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

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

18: Non-collection of children

If a child is not collected at the end of the session/day, we will refer to our Non-Collection Policy. If a child has not been collected by 6pm, or we have concerns about the non-collection of a child, we will contact the Local Authority Children's Safeguarding Team and/or the police.

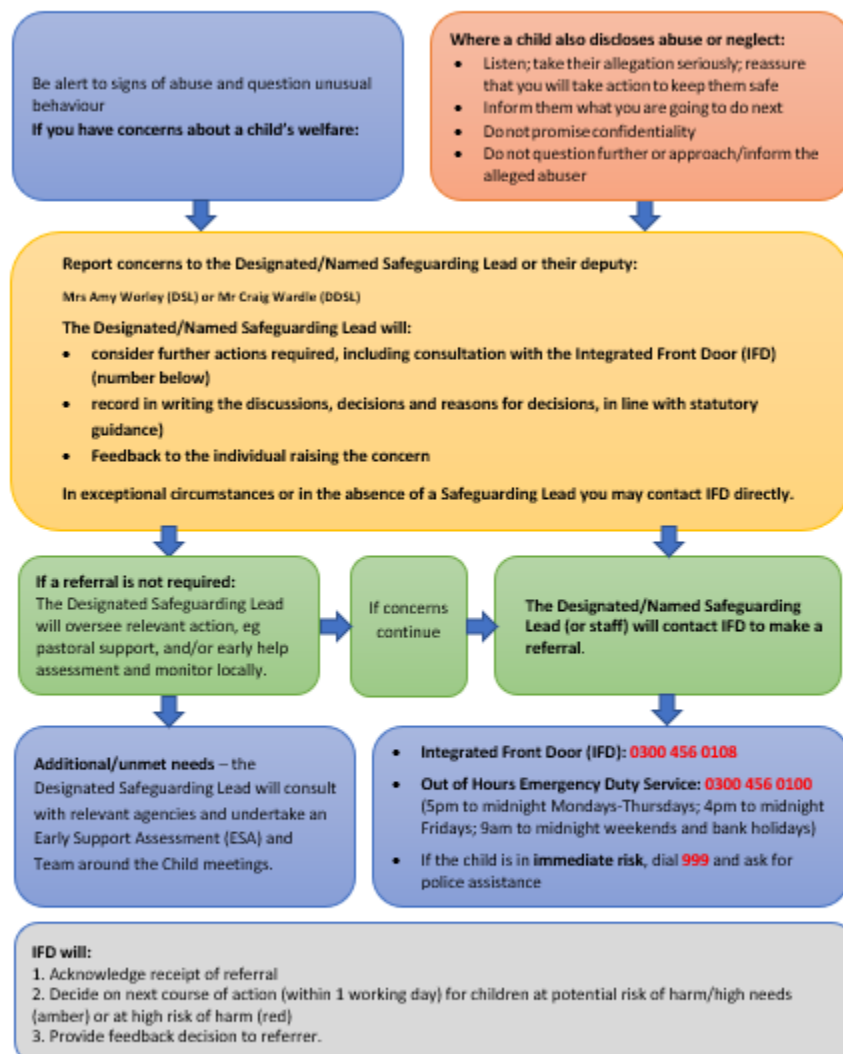
19: Missing children

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow the school's Missing Child Policy.

Appendix 5

What to do if you are worried a child is being abused, neglected or exploited

For staff, volunteers and visitors in all agencies and settings



This flowchart is intended for use as a brief guide. Refer to the Wiltshire SVPP 'Multi-Agency Threshold guidance' and the DfE Guidance 'What to do if you are worried a child is being abused' for more information, definitions and possible indicators of abuse.

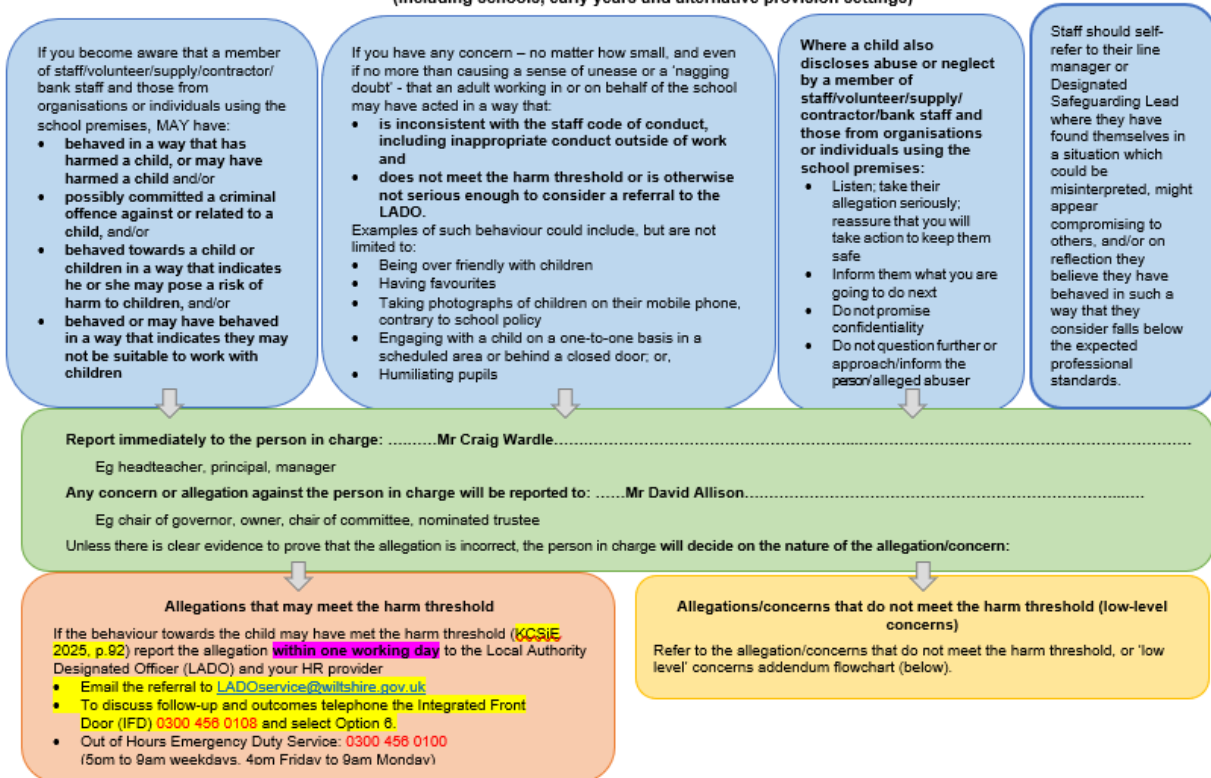
SVPP website: www.wiltshiresvpp.org.uk

Reviewed: September 2024

Appendix 6

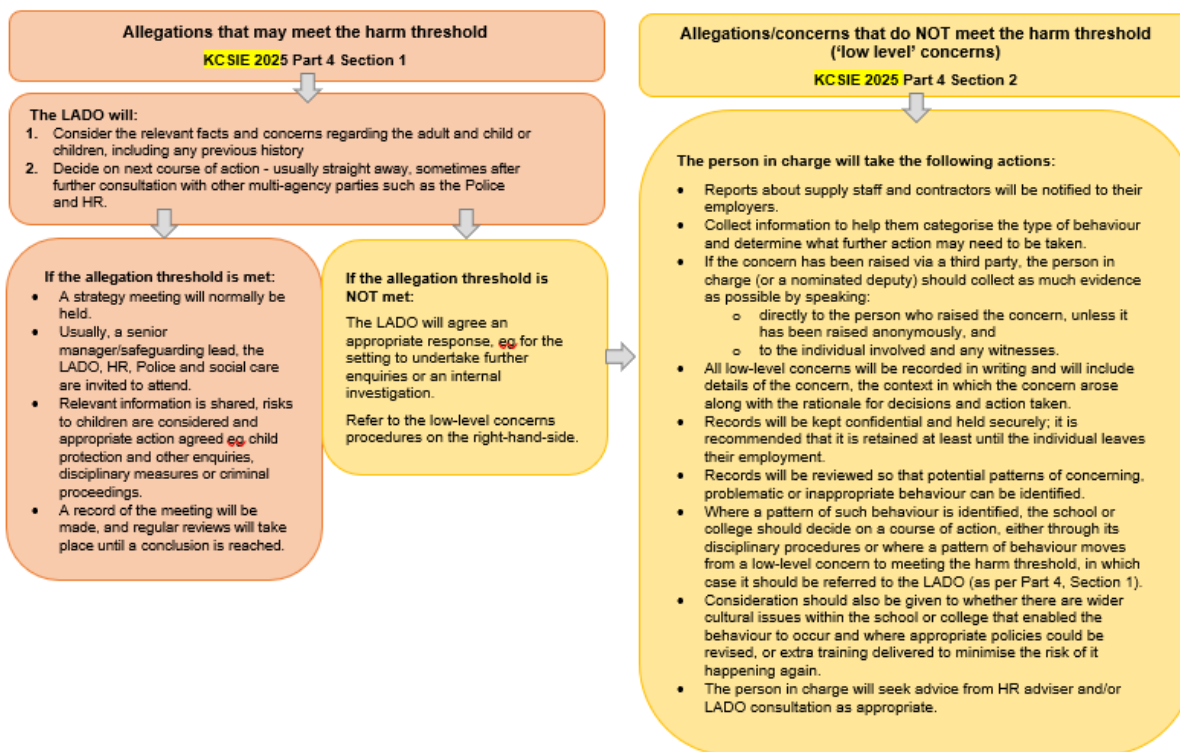


Allegations and concerns against adults in education settings – July 2025 (including schools, early years and alternative provision settings)





Allegation/concerns guidance for persons in charge – July 2025



Appendix 7: Logging a concern about a child

Appendix 6 : Body Map Guidance for Schools

Medical assistance should be sought where appropriate.

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

At no time should an individual teacher/member of staff or school be asked to or consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedure. The body map below should be used in accordance with recording guidance. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the child's social worker if already an open case to social care.

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?

- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

It is important that the date and time of the recording is stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and record

A copy of the body map should be kept on the child's concern/confidential file.

Body Map

BODYMAP

(This must be completed at time of observation)

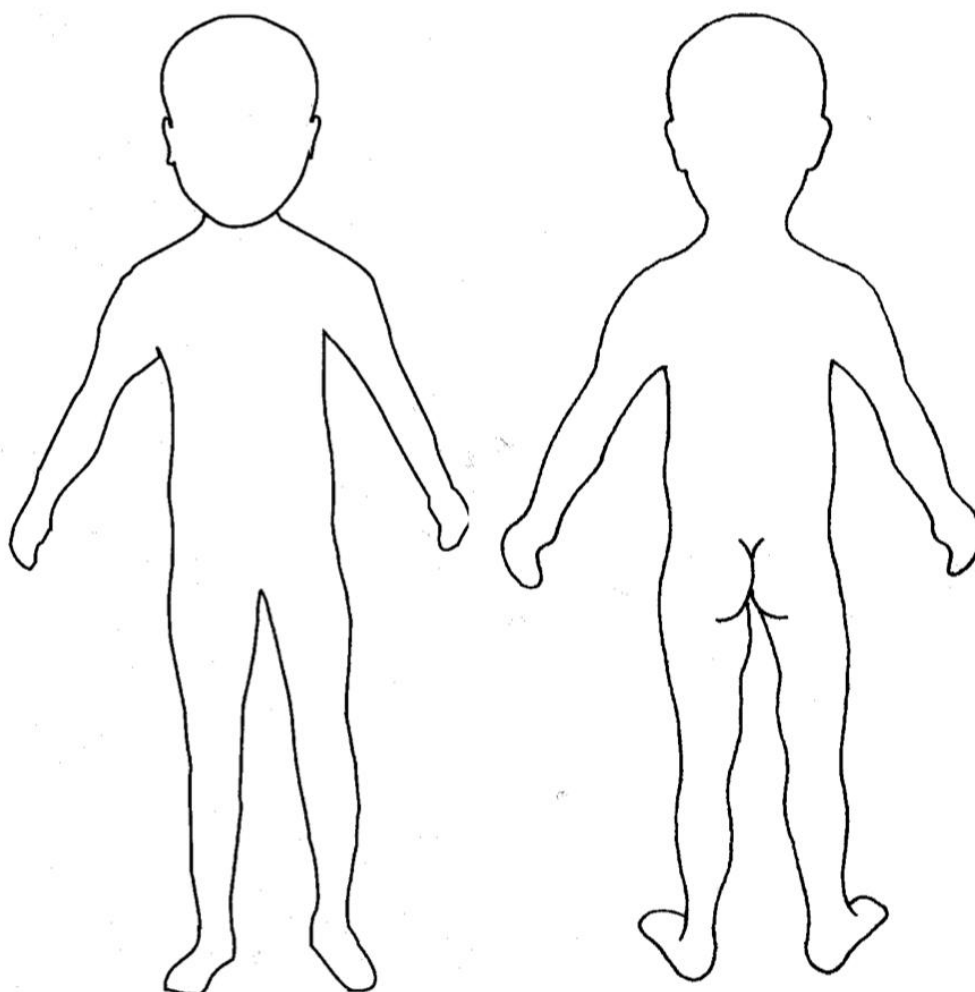
Names for
Child: _____

Date of
Birth: _____

Name of
Worker: _____

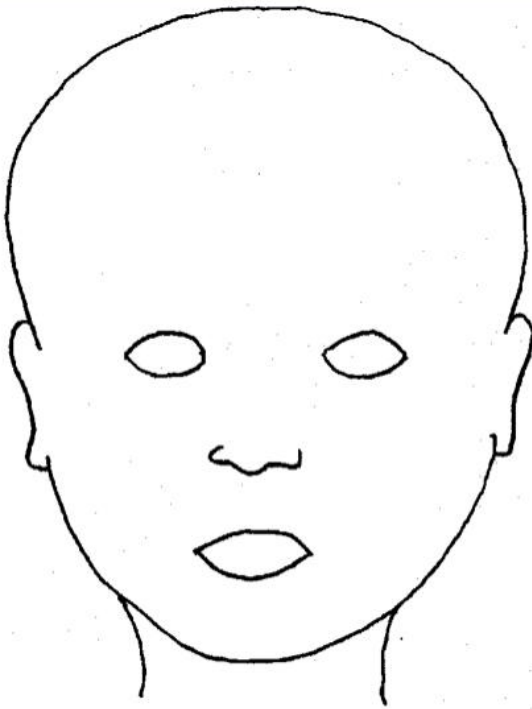
Agency: _____

Date and time of
observation: _____

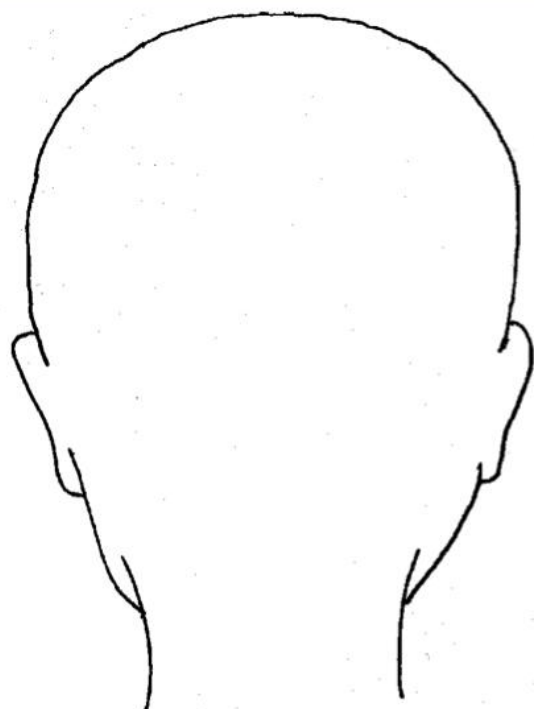


Name of
Child:

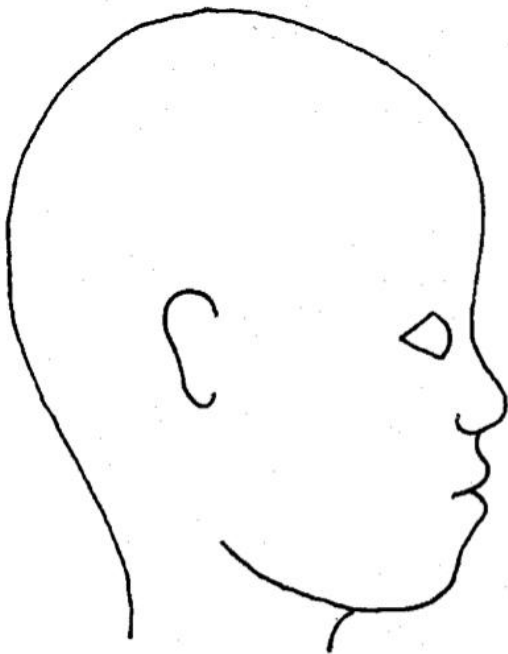
Date of
observation:



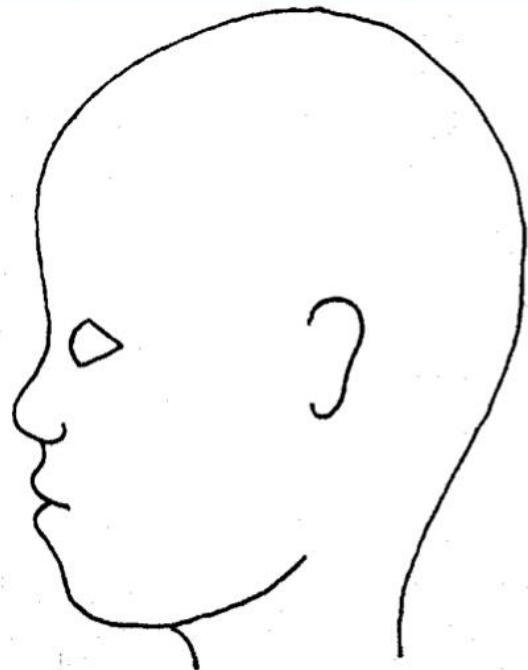
FRONT



BACK



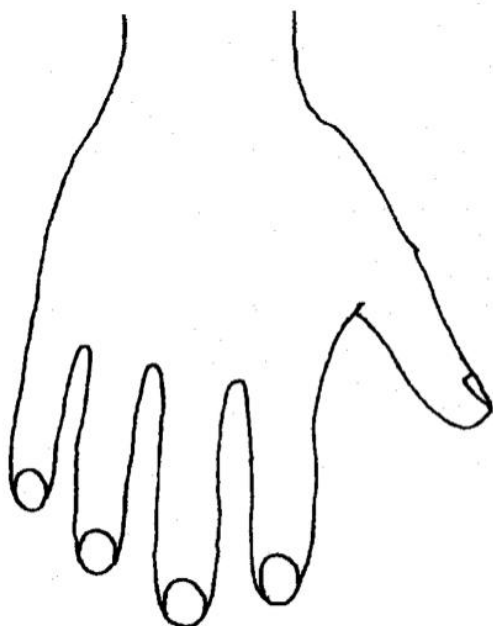
RIGHT



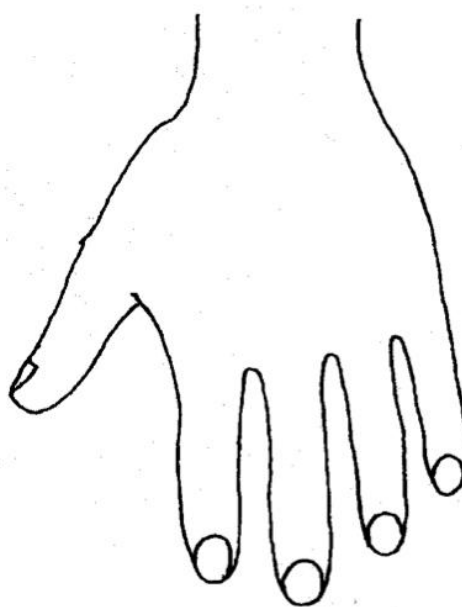
LEFT

Name of Child: _____

Date of
observation: _____

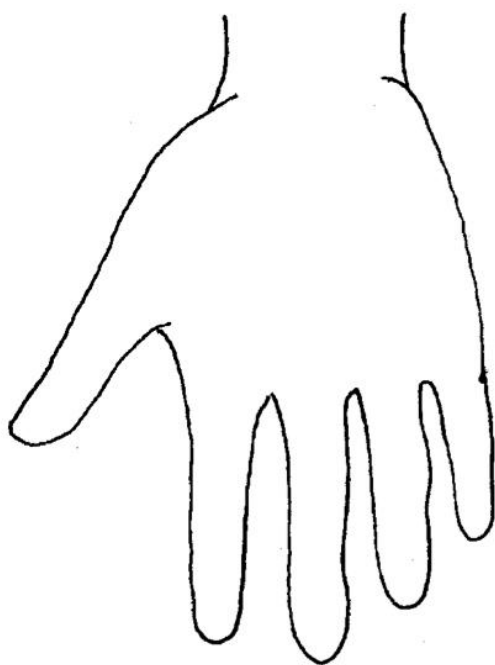


R



L

BACK



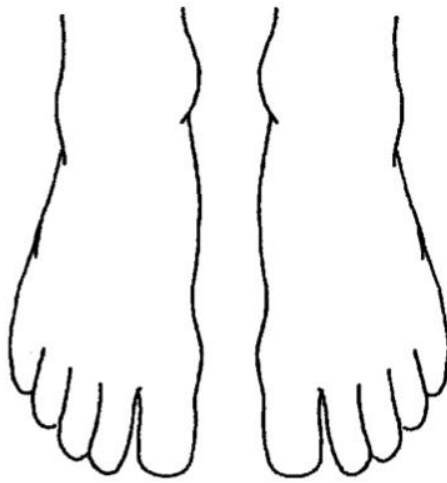
R



L

Name of
Child: _____

Date of
observation: _____



R

TOP

L



R

BOTTOM

L



R



L

INNER



R



L

OUTER

Printed Name and
Signature of worker: _____

Date: _____

Time: _____

Role of Worker _____

Other information: _____

Appendix 7: Children who are Absent from Education Policy

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We are aware that local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

We recognise that a child being absent from education is a potential indicator of abuse or neglect.

When a child is absent from school without authority we will follow our procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

We have an admission register and an attendance register which supports the school in safeguarding children who may be at risk of missing education.

We will discuss and agree actions with regards to individual cases with the relevant colleagues in safeguarding/education within Wiltshire County Council for children who are to be removed from the admission register where the child:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education – this will be communicated with the home elective team.
- does not arrive at the school as part of an admission process and we are not aware of their whereabouts.
- has ceased to attend school mid key stage because parents have relocated or have decided to send their child to a different school.
- has been permanently excluded. (The actions that will be taken by the school are in the Guidance For Head Teachers and Business Managers where Children are at Risk of Missing Education (Wiltshire))

The flow chart (located in the school office) summarises that every child should be accounted for, their whereabouts should be known or we will make a referral to the relevant service. We will not remove a child from our role until we have informed the local authority that this is happening.

Where a child who fails to attend our school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more we will follow Wiltshire County Council's Guidance for Head Teachers and Business Managers where Children are at Risk of Missing Education.

Absence

Please refer to the School's Attendance Policy for full details.

If a child is 'missing', their whereabouts cannot be established within the school. Schools will need to identify whether the child is at significant risk.

Children are more vulnerable who:

- are on a plan (child protection plan, child in need plan, looked after child, early help assessment).
- have specialist educational needs and / or a disability.
- are using substances.
- have an education health care plan.
- there are indications that the child is at risk of CSE, grooming, radicalisation etc.

There may be other contributing factors that should be taken into consideration when determining if the child is at significant risk such as the child's emotional health, known issues at home etc. School staff will always try to locate the child and attempt to establish the whereabouts of the child. Once a child has been identified as missing and cannot be

located within school, the designated safeguarding lead will be informed. Staff will use their professional judgement and risk assess the urgency of the situation to help inform the timeframe required in establishing the child's whereabouts before notifying the police. Parents/carers will always be informed before contact with the police is made, unless a child is at immediate risk of harm and a police response is needed. This will be judged on a case-by-case basis.

When a decision has been made to contact the police, the police will require information from the school to assist in locating the child and returning them to a safe environment. If a child has a social worker or LADO(e.g. early help assessment) then they should also be informed. Where a child is known to regularly go missing from school, a risk assessment for the child will be under- taken.

For further guidance see <https://www.wiltshire.gov.uk/cse-going-missing>

Appendix 8: Child-on-child Abuse Policy

Introduction

Avondale Preparatory School recognises that children are vulnerable to and capable of abusing their peers and that it can happen both inside and outside of school. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Child-on-child abuse will not be tolerated or passed off as part of “banter” or “growing up”. All staff have a role to play in challenging inappropriate behaviour between peers. The school recognises that, even if there are no reported cases of child-on-child abuse, this does not mean that it is not occurring within school, just that it is not being reported.

We are committed to a whole school approach to ensure the prevention, early identification and appropriate management of child-on-child abuse within our school and beyond.

In cases where child-on-child abuse is identified we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

We recognise that child-on-child abuse can manifest itself in many ways such as:

- Child Sexual Exploitation
- Sexual Violence
- Sexual Harassment
- Sexting or youth produced digital imagery
- Up skirting
- Bullying
- Cyberbullying
- Prejudice-based bullying
- Discriminatory bullying
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang association and serious violence (County Lines)
- Technology can be used for bullying and other abusive behaviour
- Physical abuse
- Consensual and non-consensual sharing of nude and semi-nude images
- Causing someone to engage in sexual activity without consent
- Initiation/hazing-type violence rituals

We also recognise that these behaviours can occur online as well as face to face.

Some of these behaviours will need to be handled with reference to other policies in school such as the behaviour policy, anti- bullying policy, child protection policy and online safety policy, and also with reference to the RSE Statutory Guidance (2023).

This policy concentrates on child-on-child abuse in the context of sexual harassment and sexual violence. It is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2025) and should be read in conjunction with the Local Safeguarding Children Partnership's (SVPP WILTSHIRE) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

Aims

The policy will:

- Set out our strategies for preventing, identifying and managing child-on-child abuse
- Take a contextual approach to safeguarding all children and young people involved. Acknowledging that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents, or adults in the community
- Recognise that this behaviour can occur online as well as face to face and both are part of our safeguarding duty of care.

Understanding Child-on-child abuse

Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children.

The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.

Sexual harassment and sexual violence may also occur online and offline.

The Context

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

In this policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB).

We are adopting the NSPCC definition of HSB as:

"Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

Also useful is Simon Hackett's continuum model to demonstrate the range of sexual behaviour. (Appendix 1)

Minimising the Risk of Child-on-child Abuse

Avondale Preparatory School recognises the wide variety of children's backgrounds and cultures who attend the school and as such, the requirement for us to promote children to respect, tolerate and show goodwill toward each other. We have employed a number of procedures to help minimise the risk of child-on-child abuse, with the majority of these focusing on educating our children about what is and what is not appropriate with regards to all forms of relationships with their peers. As part of our PSHEE and Relationship and Sex Education (RSE) lessons, we promote healthy and respectful child to child communications and behaviours between our children and provide an environment which challenges inappropriate behaviour. We teach our children to look out for potential signs that there may be an imbalance in power or control, the importance of permission- seeking and -giving in relationships with friends, peers and adults and what to do to seek support. We make it explicit to our children, in an age-appropriate manner, what constitutes sexual harassment and sexual violence and why these are always unacceptable. We also teach our children about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help.

Vulnerable groups

We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable.

This can include:

- experience of abuse within their family;
- living with domestic violence;
- young people in care;
- children who go missing;
- children with additional needs (SEN and/or disabilities);
- children who identify or are perceived as LGBTQ+ and/or have other protected characteristics under the Equalities Act 2010.

Whilst research tells us girls are more frequently identified as being abused by their peers and, girls are more likely to experience unwanted sexual touching in schools, but this is not confined to girls.

Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience child-on-child abuse but they do so in gendered ways.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children

have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Responding to Alleged incidents of Sexual Violence and Sexual Harassment

All reports of child-on-child abuse will be made on a case-by-case basis with the designated safeguarding lead or their deputy taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

The immediate response to a report

- The school will take all reports seriously and will reassure the victim that and that they will be supported and kept safe.
- All staff will be trained to manage a report.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated lead or social care) staff will however only share the report with those people who are necessary to progress it.
- A written report will be made as soon after the interview as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element the school will follow advice on searching screening and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present.
- The DSL will be informed as soon as possible.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report

of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them;

Risk assessments will be recorded and stored in the Child-on-child Risk Assessment file in the office and be kept under review.

The designated safeguarding lead (or a deputy) will ensure they are engaging with MASH.

Action following a report of sexual violence and/or sexual harassment

Following an incident, we will consider

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment;
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse;
 - Are there ongoing risks to the victim, other children, adult students or school staff; and other related issues and wider context?

Follow up Actions

Children sharing a classroom:

Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police:

- The perpetrator will be removed from any classes they share with the victim.
- Consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises.

These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

Options to manage the report

Manage internally

1. In some cases of sexual harassment, for example one-off incidents, we may decide that the children concerned are not in need of early help assessment or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support. This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored by the DSL in the Child-on-child Incidents File.
2. In line with 1 above, we may decide that the children involved do not require statutory interventions but may benefit from early help assessment. Early help assessment means providing support as soon as a problem emerges at any point in a child's life. Providing early help assessment is more effective in promoting the welfare of children than reacting later. Early help assessment can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
3. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH following locally agreed protocols. (Pathway to Provision V9)

Where statutory assessments are appropriate, the designated safeguarding lead or a deputy will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

The school does not require parental consent to refer information to other authorities.

Reporting to the Police

Any report to the police will generally be made through the MASH as above. The designated safeguarding lead (and deputy) will follow local process for referrals.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

The end of the criminal process

If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action in light of our behaviour policy. If the perpetrator remains in school/academy we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate with regard to the perpetrator's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other children or students in the school.

We will ensure all children involved are protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

Support for Children Affected by Sexual Assault

Support for victims of sexual assault is available from a variety of agencies (see Appendix 3). We will support the victim of sexual assault to remain in school but if they are unable to do

so we will enable them to continue their education elsewhere. This decision will be made only at the request of the child and their family.

If they are moved we will ensure the new school is aware of the ongoing support they may need. The DSL will support this move.

Where there is a criminal investigation the alleged perpetrator will be removed from any shared classes with the victim and we will also consider how best to keep them a reasonable distance apart on the school premises. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings. We will work closely with the police.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially other children or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable.
- involves a single incident or has occurred over a period of time.
- is socially acceptable within the peer group.
- is problematic and concerning.

- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability.
- involves an element of coercion or pre-planning.
- involves a power imbalance between the child/children allegedly responsible for the behaviour.
- involves a misuse of power.

Online Behaviour

Many forms of child-on-child abuse have an element of online behaviour including behaviours such as cyberbullying and sexting.

Policies and procedures concerning this type of behaviour can be found (anti bullying policy, on- line safety and child protection policy)

Prevention

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Avondale Preparatory School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all Senior Leadership Team, staff and volunteers, children and parents about this issue. This will include training all Senior Leadership Team and staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes
 - (a) Contextual Safeguarding;
 - (b) The identification and classification of specific behaviours; and

- (c) The importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horse- play or teasing.
- Educating children about the nature and prevalence of child-on-child abuse via PSHE, RHE, RSHE and the wider curriculum (in line with RSE Statutory Guidance, 2023)
 - Children/Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
 - They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
 - Children are made aware that the law is in place to protect rather than criminalise them.
 - We include information in lessons about how child-on-child abuse can be intra-familial.
 - Engaging parents on this issue by:
 - (a) Talking about it with parents, both in groups and one to one;
 - (b) Encouraging parents to hold the School to account on this issue.
 - (c) Involving parents in the review of School policies and lesson plans; and
 - (d) Encouraging parents to hold the School to account on this issue.
 - Ensuring that all child-on-child abuse issues are fed back to the School's Safeguarding Lead so that they can spot and address any concerning trends and identify children who may be in need of additional support. This is done by way of a fortnightly staff meeting at which all concerns about children (including child-on-child abuse issues) are discussed;
 - Challenging the attitudes that underlie such abuse (both inside and outside the classroom);

- Working with Senior Leadership Team, all staff and volunteers, children and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- Creating conditions in which our children can aspire to and realise safe and healthy relationships;
- Creating a culture in which our children feel able to share their concerns openly, in a non-judgmental environment, and have them listened to;
- Responding to cases of child-on-child abuse promptly and appropriately.

Multi-agency working

The School actively engages with its local partners in relation to child-on-child abuse, and works closely with, Wiltshire's Intergraded Front Door System and MASH (Multi Agency Safeguarding Hub).

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of child-on-child abuse. They help the School:

- (a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist;
- (b) To ensure that our children are able to access the range of services and support they need quickly;
- (c) To support and help inform our local community's response to child-on-child abuse;
- (d) To increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our children

The School actively refers concerns/allegations of child-on-child abuse where necessary to Wiltshire MASH, children's social care, and/or other relevant agencies.

Children resident out of county but attending a Wiltshire school will be reported to their home MASH or equivalent Social Care.

In cases involving children who are subject to risk, harm, and abuse and who have LAC status, the children's social worker must be informed and a coordinated approach to address any incidents or concerns will be required.

Appendix 1

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	• Single instances of inappropriate sexual behaviour	• Problematic and concerning behaviours	• Victimising intent or outcome	• Physically violent sexual abuse
Socially acceptable	• Socially acceptable behaviour within peer group	• Developmentally unusual and socially unexpected	• Includes misuse of power	• Highly intrusive
Consensual, mutual, reciprocal	• Context for behaviour may be inappropriate	• No overt elements of victimisation	• Coercion and force to ensure victim compliance	• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision making	• Generally consensual and reciprocal	• Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence	• Sadism

Support for Young People: Local and National

Horizon Victim and Witness care (<https://www.wiltshire-pcc.gov.uk/Victims-and-Witnesses/Horizon/>) provide emotional and practical support for victims of sexual violence. They are at the centre of Wiltshire and Swindon's model of support services, who provide support to all victims of crime. Also see:

- Child and adolescent mental health services (CAMHS) <https://www.oxfordhealth.nhs.uk/camhs/wilts/>
- Internet Watch Foundation (to potentially remove illegal images) www.iwf.org.uk

Useful Publications and Websites

Sexual harassment and sexual violence in schools

www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges

Keeping Children Safe in Education

www.gov.uk/government/publications/keeping-children-safe-in-education

Preventing youth violence and gang involvement

www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence

Preventing and tackling bullying in schools

Ofsted – Review of sexual abuse in schools and colleges June 2021

www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges

Other useful documents

Sexting

Sharing nudes and semi-nudes: advice for education settings working with children and young people 2020

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

Child-on-child abuse

Farrer & Co - Child-on-child abuse toolkit, guidance on child on child abuse policy and template child-on-child abuse policy

www.farrer.co.uk/Global/Child-on-child%20abuse%20toolkit%2014.pdf

Anti-bullying Alliance

Sexual Bullying: Developing Effective Anti-bullying Practice A guide for school staff and other professionals

<https://anti-bullyingalliance.org.uk/>

Preventing abuse among children and young people-guidance from Stop it Now. What is Age appropriate?

<http://www.stopitnow.org/ohc-content/what-is-age-appropriate>

NSPCC-Harmful sexual behaviour

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/>

NCB Harmful sexual behaviour

<https://www.ncb.org.uk/resources-publications/resources/workforce-perspectives-harmful-sexual-behaviour>

NSPCC – Is this sexual abuse?

<https://www.nspcc.org.uk/globalassets/documents/research-reports/nspcc-helplines-report-peer-sexual-abuse.pdf>

Online sexual harassment

Project deSHAME- Digital Exploitation and Sexual Harassment Amongst Minors in Europe
Understanding, Preventing, Responding

<https://www.childnet.com/our-projects/project-deshame>

Sexism

It's Just Everywhere- a study on sexism in schools –and how we tackle it

<https://ukfeminista.org.uk/wp-content/uploads/2017/12/Report-Its-just-everywhere.pdf>

Appendix 9a

Peer-on-peer sexual abuse: what to do if a child makes a disclosure

Make sure you understand and follow our child protection policy and procedures for dealing with peer-on-peer sexual abuse. If you have any concerns about a child's welfare, act on them immediately - don't wait for a disclosure.

- ✓ Ask the child outright if they've been harmed and what the nature of the harm was
- ✓ Listen and reassure them that they will be supported and kept safe
- ✓ Reflect back, using their language
- ✓ Be mindful that some children may face additional barriers to disclosure because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- ✓ Remember that:
 - This may only be the first incident the child has reported
 - Trauma can impact memory, so the child may not be able to recall all of the details or timeline of the abuse
- ✓ Make a written record as soon as possible, stating only the facts
- ✓ Tell our designated safeguarding lead (DSL) urgently:
- ✓ Where appropriate, take action yourself
 - If the child is in immediate danger or at risk of harm, make a referral to children's social care
 - If an offence has been committed, report it to the police (even if the alleged perpetrator(s) is under 10). You can confiscate devices as evidence for the police, if the report includes an online element.
 - Find out whether the victim and alleged perpetrator(s) share classes, premises or transport, and consider how to keep them a reasonable distance apart while on the premises, including both before and after school

- ✗ Dismiss the incident as 'banter', 'part of growing up' or 'having a laugh'
- ✗ Ask leading questions
- ✗ Promise total confidentiality - explain who you will need to tell and why
- ✗ View photos or videos of a sexual nature
 - If you do so by accident or think you might need to in order to deal with the issue effectively, talk to our DSL
- ✗ Take notes while the child is talking, if at all possible
- ✗ Tell anyone about the disclosure unless they need to know in order to progress it

Key definitions

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

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

Sexual harassment: unwanted conduct of a sexual nature – such as sexual comments, sexual jokes or taunting, physical behaviour like interfering with clothes, or online harassment such as sexting

Upskirting: taking a picture under a person's clothing without their permission to obtain sexual gratification or cause the victim humiliation, distress or alarm

Sexual activity is an offence if:

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

Someone consents if they:

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

Appendix 10

Induction Checklist for Safeguarding

This checklist should be used for all school-based employees and volunteers.

Safeguarding Induction Checklist for New Staff

Name of employee: _____

Name of DSL (or person completing checklist): _____

This checklist should be used for all school-based employees and volunteers.

Employee informed that the senior designated safeguarding lead in school is Mrs Amy Worley	
Inform staff of the procedure in school for reporting safeguarding concerns, including the procedure if the headteacher, designated safeguarding lead and deputy designated safeguarding lead are absent.	
Advised of and discussed the following school policies, covering the agreed procedures and expectations of staff under each on: - Code of conduct/Staff behaviour policy (including whistleblowing) - Anti-bullying - Equality - Physical intervention - Internet safety (including social media)/acceptable use policies - Contact between staff and pupils outside the usual work context - Whole school child protection policy and appendix templated (which include procedures for dealing with child-on-child abuse) - Allegations of abuse made against teachers and other staff - The management of visitors on site	

- Pupil behaviour policy - Safeguarding response to children who go missing from education (CME policy)	
Advised of and discussed all statutory guidance for schools and the responsibility of staff within them. - Keeping Children Safe in Education (senior designated lead officer will ensure <u>all staff read and have a copy of part one</u> of the latest edition of Keeping Children Safe in Education 2025 including Annex A and B and Part 5). - Working Together to Safeguard Children 2023 - Dealing with allegations of abuse made against teachers and other staff (part 4 of the latest edition of KCSiE)	
Advised and discussed the Wiltshire County Council Safeguarding Children Boards' Safeguarding Children's procedures and how they can be accessed	
Advised of and discussed the relevant paragraphs under the Teacher Standards (see part 2 of the standards, 3 rd bullet point) if appropriate to the role	
Arranged safeguarding training as detailed in the latest edition of Keeping Children Safe in Education 2025.	
DSL Signature: _____ Date: _____ Employee Signature: _____ Date: _____	

Appendix 11

Mobile Phones and Cameras

Aim of the Policy

Avondale Preparatory School fosters a ‘culture of safety’ in which the children and staff are protected from abuse, harm, and distress. We therefore have a clear policy on the acceptable use of mobile phones that is understood and adhered to by everyone: staff, children and parents. Abiding by the terms of the school’s mobile phone policy ensures that we all:

- Protect children from harm and abuse
- Prevent staff from being subject to false allegations
- Help staff remain focused on the care of children
- Work in an open and transparent environment.

Mobile Phones

- Staff can bring their personal mobile phone to school. Practitioners must ensure that there are no inappropriate or illegal content on their device.
- All staff must ensure that their mobile phones kept in their bags at all times.
- Mobile phone calls can be taken in a room without children present at break times or in the school office.
- The school hold details of each practitioners emergency contact number of the next of kin.
- All helpers will be requested to leave their mobile phone in their bags.
- KS2 children are not allowed to bring their mobile phones to school.
- Mobile phones *must not* be used to photograph children.
- The Co-Headteacher reserves the right to check the image content of a member of staff’s mobile phone should there be any cause for concern.

- Should inappropriate material be found the Local Authority Designated Safeguarding Officer (LADO) will be contacted immediately. Appropriate procedures will then follow.

Cameras

Under no circumstances are images, videos or audio recordings to be made without prior explicit written consent by the designated safeguarding person.

School cameras must be used or the school memory card. Memory cards should then be removed and the content loaded onto the school computers in the classrooms and stored on the Sharepoint.

Only the designated tablets or cameras are to be used to take any photographs within the school campus, and on an educational outings.

EYFS staff will be responsible for collating pictures to be included in each child's Learning Journey on Tapestry.

No personal devices or cameras should be taken into the children's toilets.

Procedures

Consent is required under the Data Protection Act 1998 as images are considered to be personal data.

- All images are to be stored and disposed of in line with Data Protection Act 1998.
- Security procedures must be monitored and reviewed regularly by the designated safeguarding officer. The security procedures include protection against theft of equipment and computer security.
- Consent forms must be signed by parents/carers with parental responsibility when they register their child with the setting and copies of the consent forms should be provided for the parents.
- Images must not be used for anything other than the agreed purposes unless additional consent is obtained.
- Photographs must be appropriately disposed of should they be no longer required. This could include giving the images to parents, deleting or shredding.

- Where group photographs of children are to be taken, written permission must be obtained from all parents /carers who have the right to refuse.
- The purpose and context for any proposed images should always be considered to decide whether a photograph or video are the most appropriate method of recording the information.
- The purpose of taking any images is to be clearly explained for example marketing of the business, prospectus, website, or local newspaper, use in display and to document children's learning.
- Each reason is to be clearly explained and agreed with an option for parents/carers to refuse any or all of the discussed uses and to withdraw consent at any time. Any consent should be reviewed on a regular basis and at least annually.
- Consent for the use of images applies to adults as well as children.
- A child's full name should not appear alongside their photographs particularly if the images could be viewed by the general public.

Learning Journeys on Tapestry (EYFS)

Learning journeys are to be treated as personal data as each journey relates to an individual, identifiable child.

- Where possible blanket consent will be requested from parent and carers for group images to be included in the learning journeys of other children. Parents and carers must be given the opportunity to view any images before they are included in any learning journey and must be given the option to restrict their consent.
- If it is not possible to obtain consent, the relevant image must not be shared across learning journeys of other children.
- Parents and carers must be reminded that they must not share, distribute or display images containing other children without the relevant permission or consent from their parents.
- Parents should be encouraged to contribute information to this learning journey, by including some information and photographs which show what their child enjoys doing at home.
- Learning journeys should remain on site at all times. If learning journeys are taken off site, this must be with prior written agreement between head

teacher/manager/practitioner and parents and a risk assessment should be undertaken.

Use of a Professional Photographer

Only a reputable photographer who can provide evidence of authenticity should be used. Their photographic identity should be checked on arrival.

- They should be viewed as visitors therefore appropriate supervision should be in place at all times to ensure no unsupervised access to children. They should be supervised by a person who is in regulated activity.
- They should be asked to sign an agreement to ensure that they comply with Data Protection requirements, to agree that images will only be used for the agreed specified purpose and not be disclosed to any third person.

Websites

www.ceop.police.uk – Reporting of use of images

www.foundationyears.org.uk – Early Years Foundation Stage Framework (2012)

www.ico.gov.uk- Data protection good practice note taking photographs in schools

http://www.ico.gov.uk/for_organisations/data_protection/topic_guides/cctv.aspx -

CCTV information

http://www.safenetwork.org.uk/help_and_advice/employing_the_right_people/Pages/regulated-activity-supervision-guidance.aspx

<http://www.iwf.org.uk>