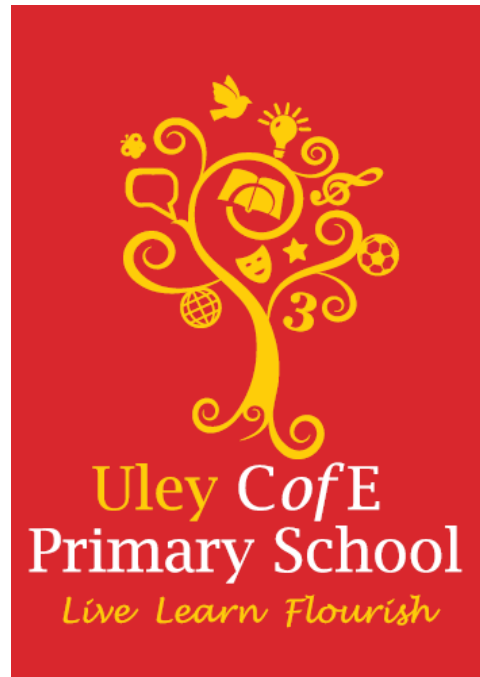


ULEY C OF E PRIMARY SCHOOL



SAFEGUARDING AND CHILD PROTECTION POLICY FOR ULEY PRE-SCHOOL, PRIMARY SCHOOL AND WRAP AROUND CARE

SEPTEMBER 2026

Our School Vision

Live – Learn – Flourish

The School Vision is rooted in the Christian understanding of God: Creator - Redeemer - Sustainer

The image of the tree reflects our rural location and aligns with our vision for the school: with strong roots for stability, growth, fruitfulness and nurture.

The tree depends on the Creator to *live*; the roots go down into the soil where transformation and *learning* take place, and the roots continually draw up the water to sustain it for fruitfulness and *flourishing*. The tree is beautiful and nurtures life within and beyond itself.

They are like trees that grow beside a stream that bear fruit at the right time and whose leaves do not dry up.

They succeed in all they do. Psalm 1:3



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Review Cycle	Date of Current Policy	Author(s) of Current Policy	Review Date
Annual	September 2026		September 2027 or when new legislation is in place.

Key contacts:

School Telephone Number		01453 860350	
Local Authority Designated Officer (LADO)	Authority Designated Officer (LADO) Allegations Management Team amadmin@gloucestershire.gov.uk 01452 426994 The Role of the LADO & The Allegations Management Process Gloucestershire County Council		
MASH (Multi Agency Safeguarding Hub)	01452 426565 (Monday to Friday 9am to 5pm) 01452 614194 (Emergency Duty Team, EDT)		
Gloucestershire Children’s Services Front Door Professional Advice Line.	Available Monday to Friday, 8:30am – 3:30pm. Support with thresholds, MARFs & graduated pathway. 01452 427070		
GSCP	https://www.gloucestershire.gov.uk/gscp/		
Community Social Workers	Brian Devers-Martin (Gloucester) Stephanie Riden (Stroud) Brian.Devers-Martin@gloucestershire.gov.uk Landline: 01452 583762 Mobile: 07899994759 Stephanie.Riden@gloucestershire.gov.uk Mobile: 07500072949		
Family Help Co-ordinators	gloucesterearlyhelp@gloucestershire.gov.uk		
Channel Helpline	020 7340 7264		
Role	Name	Email	Date
Chair of Governors	Graham Wilkes	admin@uley.gloucs.sch.uk	
Safeguarding Governor	Mark Easy Martin Bragg		
Head Teacher*	Zoe Mandeville		
Designated Safeguarding Lead (DSL)*	Zoe Mandeville		
Deputy DSL (s)*	Abigail Spain Laura Davies Megan Price Alexandra Meulbrouck		
Designated Teacher for Looked After Children*	Zoe Mandeville		
Senior Mental Health Lead* (non-mandatory)	Zoe Mandeville		
Prevent Lead	Zoe Mandeville		
Medical/Allergy Lead	Zoe Mandeville		
Confidential safeguarding mailbox: safeguarding@uley.gloucs.sch.uk			

At Uley Primary School:

- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who encounters children, their families, and carers, has a role to play.
- In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should always consider what is in the **best interests** of the child.
- We take an '**it can happen here**' approach where safeguarding is concerned.
- **Everyone** who encounters children has a role to play in identifying concerns, sharing information, and taking prompt action.
- Victims of harm should **never** be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Uley Primary School is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn.
- Acting on concerns about a child's welfare immediately.
- Fulfilling our legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm

Aims

This policy will contribute to the safeguarding of children at Uley Primary School by:

- Clarifying safeguarding expectations for members of the education setting's community, staff, volunteers, governing body, learners, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; and that our learners are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.
- Understanding extra-familial risks, recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, learners, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with learners, parents, and other agencies in the Local Safeguarding Partnership including Early Help/Family Help.

Uley Primary School is named as a relevant agency in the Local Safeguarding Partnership. (GCSP.)This policy sets out its statutory duty to co-operate, follow and comply with published arrangements as set out by the Gloucestershire's Safeguarding Children Partnership's professional expectations, roles, and responsibilities.

Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education and Working Together to Safeguard Children. It complies with the arrangements agreed and published by the Gloucestershire Safeguarding Children Partnership (GSCP).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)
- The Education (Independent School Standards) (England) Regulations 2003

- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- 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 – see Policy Statement on the Recruitment of Ex-Offenders Appendix 1
- Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026) which defines what ‘regulated activity’ is in relation to children
- Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- 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 Head Teacher 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
- The Data (Use and Access) Act 2025
- Operation Encompass statutory guidance.
- Teachers’ Standards (Guidance for school leaders, school staff and governing bodies)
- Information Sharing 2024
- What to do if you’re worried a child is being abused
- Filtering and monitoring standards in schools and colleges (DfE)
- Use of reasonable force and other restrictive interventions guidance
- Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk) Section 3 of the Early Years Foundation Stage (EYFS) statutory framework should be read alongside this policy and Keeping Children Safe in Education where children aged 0 to 5 attend school-based nurseries or reception classes (KCSIE 2026).
- Local Guidance from the Local Safeguarding Children Partnership: [Gloucestershire Safeguarding Children Partnership Multi Agency Safeguarding Procedure Manual | Gloucestershire Safeguarding Children's Partnership](#)
- Prevent duty guidance: England and Wales (2023) - GOV.UK
- Generative artificial intelligence (AI) in education - GOV.UK
-

In any conflict between the needs of the child or young person and those of parents/carers or professionals, the needs of the young person must come first. The Welfare of the Child is Paramount (The Children Act 1989)

This policy should be read in conjunction with the following policies:

- Recruitment and Selection
- How to report Low Level Concerns
- Whistleblowing Policy
- Code of Conduct for Staff/ Staff Behaviour Policy / Guidance for Safer Working Practice Feb 2022
- Behaviour (which should include measures to prevent child on child bullying, harmful sexual behaviour including cyberbullying, prejudice-based and discriminatory bullying, and suspensions and exclusions)
- Online Safety
- Self –harm
- Policy on Supporting Children in Care
- Attendance (including the safeguarding response to children who are absent or are missing from education)
- Health and Safety
- Mobile phone policy

Through regular monitoring, Head Teachers should ensure that the above policies and procedures, adopted by governing bodies and proprietors, are accessible, understood and followed by all staff.

Equality and Diversity

Everyone at Uley Primary School will make sure that all children and young people have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#).

With regards to safeguarding we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:

- Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Uley Primary School's equality statement and measurable objectives. These are available on our website.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy which can be found on the school website.

Uley Primary School also adheres to the principles of and promotes anti-oppressive practice in line of the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

We have an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

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 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.

Effective safeguarding is anti-discriminatory and anti-racist. All practitioners should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability which can impact children and families' lives.

Child Protection is part of safeguarding and promoting the welfare of children and is defined in Working Together to Safeguard Children as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse and specific safeguarding issues.

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 2 defines neglect in more detail.

Sharing of nudes and semi-nudes Making or sharing of nudes and semi-nudes is where children share nude or semi-nude images, photographs, videos or livestreams. This includes images that are digitally altered or wholly AI-generated ("deepfakes" or "deep nudes") that appear to be genuine images or videos.

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 (previously known as clinical commissioning groups) for an area 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 most 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.

Roles & Responsibilities

Safeguarding and child protection is **everyone's responsibility**. This policy applies to all staff, volunteers and governors in our school and is consistent with the procedures of the Gloucestershire Safeguarding Children Partnership. 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, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

This will be underpinned by our:

- Relationships (Behaviour) Policy
- Pastoral support system

- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

All Staff

All staff will:

- Maintain a professional curiosity and an 'it could happen here' culture.
- Read and understand Part One of KCSIE 2026 and Annex A (further information), and review this guidance at least annually
- Confirm with the Head Teacher / DSL at the beginning of each academic year, that they have reviewed the guidance, understanding that they will be questioned on their knowledge and understanding of the document and that a record of this is also held on file
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe, inclusive environment where all pupils feel able to share concerns and seek support.
- All staff will be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
 - who may need a social worker and may be experiencing abuse or neglect.
 - requiring mental health support.
 - may benefit from early help.
 - where there is a radicalisation concern.
 - where a crime may have been committed.
- Staff will declare to the Head Teacher / DSL any offences that have been brought to the attention of the police, including speeding offences.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Conduct Policy, the School's Code of Conduct, the Low Level Concerns Policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the Chair of Governors and Governors responsible for safeguarding at Uley School (see page 1), the Behaviour Policy, Online Safety Policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education (see Attendance Policy).
- Be clear as to the setting's policy and procedures about [child on child abuse](#), children missing or absent from education and [those requiring mental health support](#), and the [impact of technology in relation to online safety](#) including online filtering and monitoring processes.
- Be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems.
- Be aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within the school.

- Our Offer of Family Help and their role in the referral process; including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for community-based Family Help assessments.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection
- Extra-familial harm, recognising that abuse, exploitation and violence may occur outside the family home
- Child-on-child abuse, how to recognise it, and understand that it is a safeguarding issue for both the victim and the alleged perpetrator.
- Recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Staff understand such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff are alert to the signs and impact of prejudice based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Designated Safeguarding Lead (DSL)

- The DSL is a member of the senior leadership team. Our DSL is Zoe Mandeville – Head Teacher.
- We have a confidential safeguarding mailbox safeguarding@uley.gloucs.sch.uk
- 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.
- The DSL and DDSs have undertaken the Level 3 Inter-agency Child Protection Training to ensure they are compliant with the GCSP requirement for DSLs.
- Ensure the secure transfer of the Child Protection File when a child moves to a new setting-within 5 days for in year transfer or the first 5 days of the start of a new term.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Staff and Gloucestershire's Multi-Agency Safeguarding Hub (MASH) are also given contact details for the DSL in order to be contacted out of school hours if necessary.
- Uley School maintains robust safeguarding cover arrangements whenever the DSL is unavailable. This includes shared safeguarding communication systems and named deputy DSLs who are trained to the same standard as the DSL. In the event that all DSLs and DDSs are absent, Whitminster Primary School and Cam Hopton School may be contacted to support
- The DSL/DDSs are given the time, 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 the filtering and monitoring systems and processes in place within our school
- Make sure that staff have appropriate Prevent training and induction. Our DSL is our Prevent Lead.

All Safeguarding Leads will also:

- Keep the Head Teacher / DSL 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
- Support and advise other staff in making referrals to other agencies.
- When required, liaise with the case manager and the Local Authority Designated Officer (LADO) Service in relation to child protection cases which concern a staff member.
- Coordinate regular safeguarding training and updates and raise awareness and understanding to the school community around policies and practice in relation to safeguarding.
- Help promote educational outcomes by sharing information about vulnerable learners with relevant staff. This includes ensuring that staff:
 - know who these children are,
 - understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
 - Are supported to identify the challenges that children in this group might face.
 - Provide additional academic support or make reasonable adjustments to help children who have or have had a social worker to reach their potential.
- Support the role and duties of the named lead for health, safety and site security.
- Work with the SLT member who has lead responsibility filtering and monitoring systems to monitor and ensure their effectiveness and know how to escalate concerns when identified.
- Support the Filtering and Monitoring lead in conducting an annual review on filtering and monitoring which is presented to governors.

The full responsibilities of the DSL and deputies are set out in their job description which can be found in Appendix 3.

Governing Board

The governing board will:

- 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 it complies with the law, and hold the Head Teacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a Governors to monitor the effectiveness of this policy in conjunction with the full governing board.
- 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 the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- 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
- An annual review of filtering and monitoring arrangements to include checks across all internet-connected devices and a record of the review that has been maintained.
- Ensure the school has appropriate cyber security systems in place.
- The appointed Safeguarding Governor will liaise with the Head Teacher and the DSL to produce an annual report for governors and complete the annual Keeping Children Safe in Education Assurance Declaration from Gloucestershire Safeguarding Children Partnership.
 - Ensure that the school remedies any actions brought to its attention without delay.
 - Ensure that this document is updated termly (short) (or when there are significant updates)

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- That the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 4 and 6 of this policy covers this procedure.
- Ensure this policy reflects that children with SEND, or certain medical conditions, may experience a disproportionate impact from bullying, abuse and exploitation without outwardly displaying obvious indicators and may face additional barriers to abuse or neglect being recognised.
- Ensure that learners are taught about safeguarding on the curriculum including online safety in compliance with statutory guidance Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk) and [Delete as appropriate] Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
- Ensure that teachers, including supply teachers, trainee teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe in Education (DfE 2026, Part 3).
- Ensure that there are procedures in place to manage safeguarding concerns or allegations against teachers, including supply teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners, this includes having a process to manage low level concerns.
- Ensure that systems are in place for learners to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback.
- Ensure that the setting has systems in place to prevent, identify and respond to child-on-child harm (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices including filtering and monitoring.
- Receive an annual filtering and monitoring assurance report and review the effectiveness of arrangements.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate (see Appendix 4).

All governors will read Keeping Children Safe in Education in its entirety.

Head Teacher

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

- Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school 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
- 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 4)
- Making decisions regarding all low-level concerns
- For Early Years, ensuring the relevant staffing ratios are met
- Overseeing the safe use of technology, mobile phones and cameras in the setting

Training

Safeguarding training and CPD linked to the understanding of children's behaviour, is integral in our school and is aligned, as part of our whole school approach, to policies, staff expectations (e.g. teaching standards, staff conduct policy etc.) staff training and curriculum design. Although following statutory and national guidance, we ensure that the training we provide, is personalised to the needs of our school.

Governing bodies will ensure that all staff members undergo the Gloucestershire Safeguarding Child Partnership (GSCP) safeguarding and child protection (including online safety) training at induction.

All staff:

- Will receive appropriate safeguarding and child protection (including online safety) refresher training at least annually (via formal training, email e-bulletins and staff meetings).
- Must complete Female Genital Mutilation (FGM) awareness training and will understand their legal duty under the Mandatory Reporting Duty.
- Must complete PREVENT awareness training annually. This is to ensure that they can comply with the legal expectations under the PREVENT duty.
- Will receive training which includes clear reference to staff codes of behaviour and professional boundaries, and on the reporting of low-level concerns, internal whistleblowing policy and guidance for escalation. All staff should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Designated Safeguarding Lead and deputies:

- Will undergo formal training provided by the Gloucestershire Safeguarding Children's Partnership (GSCP) to provide them with the knowledge and skills and training (including online safety) required to carry out the role. The training will be updated every two years.
- Deputies will be trained to the same level as the DSL.
- The DSL and any deputies will liaise with the GSCP and Gloucestershire Safeguarding in Education Partnership to ensure that their knowledge and skills are updated. This could be via e-bulletins, attending DSL network meetings, attending additional training and taking time to read and digest safeguarding developments.

Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, they receive training in managing allegations for this purpose.

Other training considerations:

- The governing body will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line with School Staffing (England) Regulations 2009.
- Members of the senior leadership team will make themselves aware of and understand their role within the local safeguarding arrangements. This will ensure that those who have responsibility for the management of behaviour, inclusion, Special Educational Needs, attendance, and exclusions will carry out their duties with a safeguarding consideration.
- The Designated Teacher for Children in Care will undergo appropriate training to fulfil their role to promote the educational achievement of registered pupils who are in care.
- The mental health lead has access to appropriate training.
- Training around safeguarding issues in Annex A (including online safety and filtering and monitoring) will be integrated, aligned, and considered as part of a whole school safeguarding approach.
- Staff who are likely to need to use reasonable force and/or other restrictive interventions will be adequately trained in its safe and lawful use and in preventative strategies.
- Governors and trustees receive appropriate safeguarding and child protection training at induction.

Safeguarding and our taught and wider Curriculum

Safeguarding & Emotional Health and Wellbeing within the curriculum

Through PSHE and other curriculum contexts such as Relationships and Sex Education (RSE), children at Uley Primary School are encouraged to talk about their feelings to deal assertively with pressures that they may face.

Relevant safeguarding issues will be taught through the school's Relationships and Sex Education programme. The statutory guidance can be found here: Statutory guidance: relationships education relationships and sex education (RSE) and health education.

- Our curriculum (age-related) teaches about:
 - healthy and respectful relationships
 - boundaries and consent
 - stereotyping, prejudice and equality
 - body confidence and self-esteem
 - how to recognise an abusive relationship, including coercive and controlling behaviour
 - the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called 'honour'-based violence such as forced marriage and FGM, and how to access support, and
 - what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- A whole-setting preventative education approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict
- Appropriate filtering and monitoring systems are in place to ensure that 'over- blocking' does not lead to unreasonable restrictions as to what children can be taught about online teaching and safeguarding. (Further information can be found in KCSIE 2026)
- The curriculum is shaped to respond to safeguarding incident patterns in the setting identified by the DSL and safeguarding team (e.g., to respond to an increase in bullying incidents)
- We aim to provide engagement opportunities with parents and carers to consult on key aspects of the curriculum.
- Enabling learners to inform the curriculum via discussions with the school staff, parents and children

Every opportunity is taken to teach children about safeguarding such as misogyny and misandry, coercive control, deepfakes and AI-generated content, online manipulation and exploitation, serious violence and weapon carrying, healthy relationships and consent and how and where to seek support.

Children are listened to and provided with age-appropriate advice and guidance. They also know who they can turn to if they need help.

Staff have completed Mental Health First Aid and TEAA training (Trusted emotionally Available Adult). The school is also aware of, and makes full use of, the outcomes from the GHLL on-line pupil survey and My Happy Mind.

Mental health and wellbeing.

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their learners. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and or may require early help support or the involvement of a more specialist service.

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

Uley Primary School will ensure that preventative measures in terms of providing safeguarding on the curriculum will provide opportunities for learners to identify when they may need help, and to develop resilience.

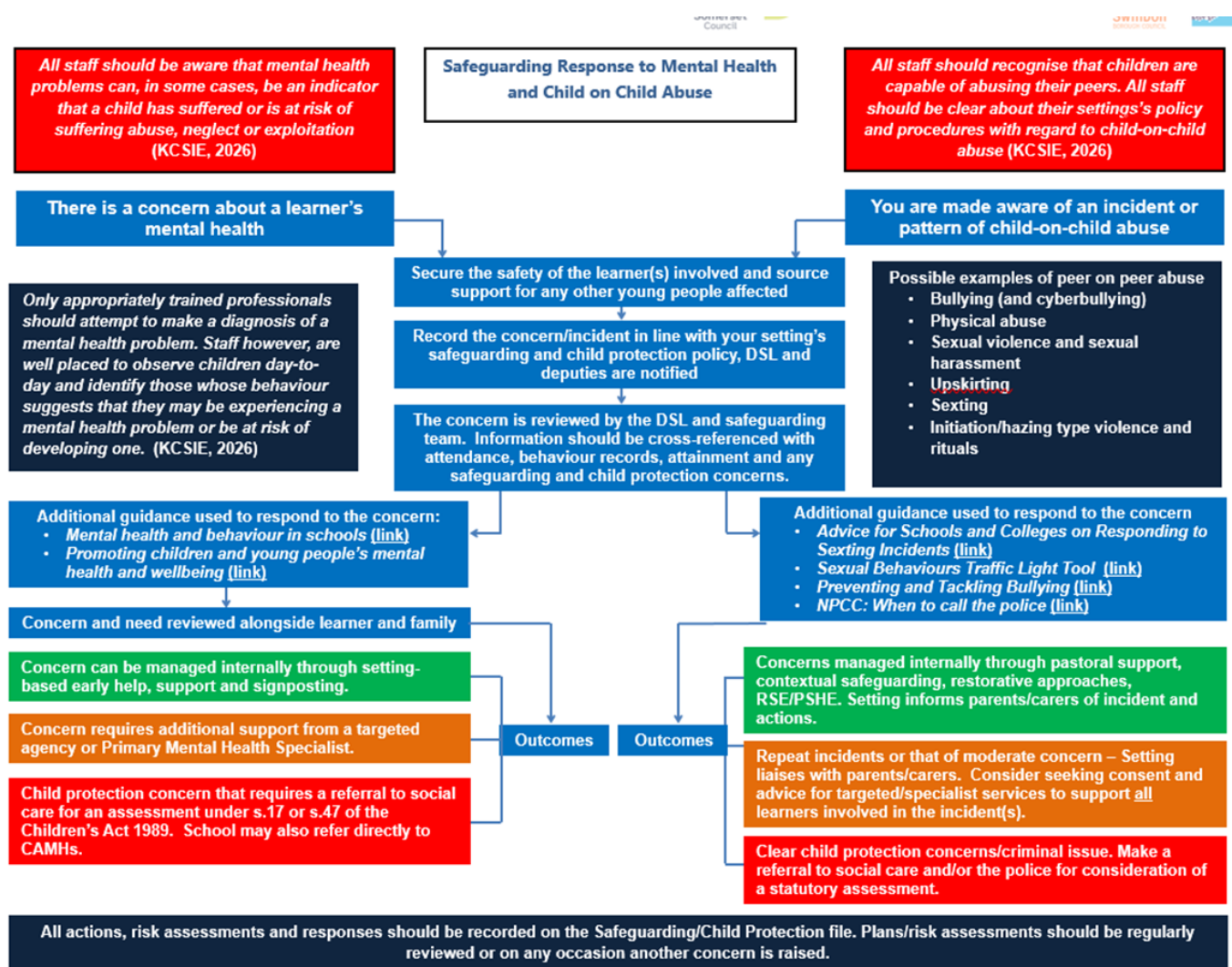
The setting will take a 'whole school approach' to:

- deliver high-quality teaching around mental health and wellbeing on the curriculum.
- having a culture that promotes mental health and wellbeing;
- having an environment that promotes mental health and wellbeing;
- making sure children and staff are aware of and able to access a range of mental health services;
- supporting staff wellbeing
- And being committed to child and parent participation

Uley Primary School:

- Has a senior mental health lead who supports the development of knowledge and acts as a point of expertise to promote the wellbeing and mental health of learners. They have sufficient training in mental health **and** safeguarding for them to carry out their role effectively.
- Reviews attendance, behaviour, attainment, and safeguarding records at least on a termly basis to enable early identification of vulnerability to mental health problems
- Use Gloucestershire Healthy Living and Learning (GHLL) to provide us with information, guidance, training and resources to support safeguarding, wellbeing, online safety, relationships education, emergency preparedness and wider child welfare issues. The school will utilise relevant GHLL resources and updates to support staff training, policy development and safeguarding practice.
- Ensures that learners can report and share concerns in line with section [2.1 Reporting a concern](#) of this policy.
- Ensures staff follow a safeguarding process in terms of reporting concerns so the DSL (and wider members of the safeguarding team such as the SENDCo) can assess whether there are any other vulnerabilities can be identified and proportionate support considered.
- Responds to the immediate health and safety of a learner who is displaying acute mental health distress. This may require support from emergency services via 999 if the learner is at risk of immediate harm.
- The DSL will consider whether a case can be managed internally, through early help/family help, or should involve other agencies as required in line with section [2.4 - Multi-Agency Working](#).
- Communicates and works with the learner and parents/carers to ensure that interventions are in the best interests of the child.
- The DSL liaises with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team access specialist advice through targeted services.

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



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.

To address this, our schools aim to:

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

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, antisemitism, radicalisation and extremism, extreme sexual violence, misinformation, disinformation & conspiracy theories

- 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, harmful interaction with generative AI applications that simulate users
- 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 seminudes and/or pornography), sharing other explicit images and online bullying; and AI-generated sexual images
- 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 pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are 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 the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the 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 pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' 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
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children 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
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- For concerns around individual cases where a child has been harmed through online mediums, advice and guidance can be made through the **Professional Online Safeguarding Helpline**, T: 0344 381 4772, E: helpline@saferinternet.org.uk
- Where there have been established cases of online abuse or grooming, we will alert - **Child Exploitation and Online Protection command (CEOPS)** <https://www.ceop.police.uk/ceop-reporting/>
- Paragraph 162 to 182 of Keeping Children Safe in Education highlights additional actions schools should take to keep learners safe online.

Artificial intelligence (AI)

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 Gemini.

Uley Primary 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.

Uley primary 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.

AI-generated nude and semi-nude imagery ("deep nudes") will be treated under safeguarding procedures in the same way as genuine imagery.

Staff should remain professionally curious regarding the use of emerging technologies and understand that safeguarding risks associated with artificial intelligence are likely to evolve rapidly. They should carry out risk assessments for any new AI tool being used by the school. Filtering and monitoring systems apply equally to the use of generative AI.

Safer Recruitment and Safer Working Practices

Uley Primary School pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education, Part Three' (2026), ensuring we maintain an accurate Single Central Record.

- This includes scrutinising applicants, by verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and identifying any gaps within this, and ensuring that a candidate has the health and physical capacity for the job. References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed
- It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity. An enhanced DBS with barred list check will be completed for all volunteers taking part in regulated activity in line with The Crime and Policing act 2026
- Applicants must provide an application form. A Curriculum Vitae will not be accepted as a stand-alone
- As a setting we will conduct online searches as part of our due diligence checks on short listed candidates and inform them of this
- All recruitment materials will include reference to Uley Primary School's commitment to safeguarding and promoting the wellbeing of learners
- At least one person conducting any interview for a post at the school will have undertaken safer recruitment training
- Where applicable, third party assurances are sought for contractors who are required on site, including identification checks on arrival
- Under no circumstances will a volunteer/employee/contractor on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity

Work experience

- Where a person supervising a child on a work experience placement for a child under the age of 16, provides teaching, training, instruction, care or supervision frequently, on more than 3 days in a 30-day period, or overnight, this is regulated activity and an Enhanced DBS with barred list check will be requested
- Uley Primary School cannot request an enhanced DBS check with barred list information from a work experience provider for staff supervising children aged 16 to 17; instead, Uley Primary School will seek assurance that the placement provider has appropriate safeguarding policies and procedures in place before any placement begins

See Appendix 5 of this policy for more information about our safer recruitment procedures.

Visitors

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

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

Following the national review into the treatment of Child Q, there has been significant scrutiny and calls for reform in safeguarding protocols concerning police involvement in schools. [Police Interventions in Education Settings V1 Approved June 2026 \(1\).pdf](#) sets out clear GSCP guidance for managing police interventions within educational settings.

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

Whistle-Blowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

Whistle-blowing about the Head Teacher should be made to the Chair of the Governing Body, whose contact details are readily available via the school office. If staff members have concerns about another staff member, then this should be referred to the Head Teacher / DSL.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously. Appropriate whistleblowing procedures are suitably reflected in the Safeguarding Induction Pack and Staff Code of Conduct policy to enable this to happen.

Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Further details of our procedures for Whistle-Blowing can be found in our Whistle-Blowing Policy; a copy of which can be found on the school website.

Use of restrictive interventions

At Uley Primary School our aim is to create a safe, secure and supportive environment for all our pupils and staff. There are times when the use of restrictive interventions, including reasonable force and seclusion, is lawful and necessary to keep people safe. However, we understand that the use of restrictive interventions can have a significant impact on pupils, staff and parents/carers. In our school, they are only ever considered as a last resort, once all other prevention and de-escalation strategies have been exhausted.

- The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation and will follow government guidance [Use of reasonable force and other restrictive interventions guidance](#)
- There is robust recording and reporting of any incident where restrictive interventions including reasonable force and seclusion have been used. Further review of the incident is carried out to reflect on how the incident could be avoided, this will involve the child and their family.

Further details can be found in our Behaviour Policy.

Site Safety

Risk assessments are undertaken and maintained in accordance with the school's health and safety policy. The school ensures that if / when our premises are hired or rented to other organisations (ASC, evening and weekend clubs) including shared site providers who work with children, those organisations adhere to the guidance for out-of-school settings. After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK (www.gov.uk).

Where the school's premises are hired or rented to another organisation, Uley Primary School will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place, including inspecting these where needed, and will ensure there are arrangements for the provider to liaise with the school on safeguarding matters. Safeguarding requirements will be included as a condition of use in any lease or hire agreement, and failure to comply with this could lead to termination of that agreement.

The school maintains comprehensive emergency preparedness plans to respond to emergencies and critical incidents, in line with the requirements of Martyn's Law. These plans include procedures for evacuation to an alternative premises, invacuation to a designated safe internal area and lockdown arrangements. Regular practice drills are conducted to ensure staff and children are familiar with emergency procedures and can respond effectively.

Child absconding/missing from site

Any incident where a pupil leaves the school site without permission, leaves staff supervision, or where their whereabouts become unknown will be treated as a safeguarding incident. The school's response will be proportionate to the child's age, understanding, vulnerabilities and level of assessed risk.

The DSL will be informed immediately, a search of the school grounds should be undertaken, parents/carers contacted, and where vulnerability factors are identified, the police and Children's Social Care will be notified. All incidents will be recorded as safeguarding, reviewed and used to inform future risk assessment and safeguarding planning.

Please see our Absconding Policy

Off Site Visits

Off site visits will be the subject of a risk assessment. Safeguarding concerns or allegations will be responded to following the allegations management procedures as outlined within this policy. The member of staff in charge of the visit will report any safeguarding concerns to the Designated Safeguarding Lead, who will pass the concern to Social Care if appropriate. In an emergency, the staff member in charge will contact the police and/or social care. The child protection/safeguarding policy and procedures of an off-site provider e.g. water sport activity, will be checked and the DSL satisfied that they are appropriate, before using the facility.

Transport

A risk assessment is in place for all transport movements. Staff/volunteers using their own cars to transport children have insurance that covers Business use and relevant checks are carried out to ensure that vehicles have current MOTs and drivers have current driving licences. Consideration is also given to the use of booster/car seats to meet UK legislation.

Early Years settings within schools including reception age children

This section relates directly to primary schools with nurseries and/or reception classes,

Legal and policy framework

As an early years provider delivering the Early Years Foundation Stage (EYFS), we are required to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006, the Early years foundation stage (EYFS) statutory framework - GOV.UK and other related statutory guidance

Uley Primary School will ensure that children taught in nursery/preschool and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are child protection concerns.

Suitable people

- When employing early years staff, we will follow the school's Safer Recruitment processes to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children and have the relevant qualifications
- We will not allow anyone to start working or volunteering in a regulated activity with children in EYFS including reception classes until their suitability has been checked. This includes obtaining an enhanced DBS plus barred list check.
- We will not allow anyone whose suitability has not been checked, including through a criminal records check, to have unsupervised contact with children being cared for
- Staff policies will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive proper training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice
- Whenever an allegation is made against a member of staff (including support staff) in the early years setting, we will follow the School Policy. We will also inform Ofsted as soon as possible or within 14 days of any allegations of serious harm or abuse by anyone, working or looking after children at the premises whether the allegations of harm or abuse are alleged to have been committed on the premises or elsewhere, for example, on a visit
- Where early years staff are taking medication that may affect their ability to care for young children, they need to notify the head teacher and seek medical advice. Practitioners will only be allowed to directly work with children if the medical advice received confirms that the medication is unlikely to impair that person's ability to look after children properly. All medication on the premises will be stored securely, and out of reach of children, at all times.

Staff training, skills and supervision

We will ensure that:

- All staff in early years settings have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy
- All early years staff who have contact with children and families will receive supervision that helps them to effectively safeguard children by providing opportunities to discuss any issues – particularly concerning children's development or well-being, including child protection concerns and Identify solutions to address issues as they arise
- All early years staff are able to communicate effectively in English both orally and in writing
- A member of staff who holds a current paediatric first aid certificate is available on the school premises at all times and accompanies children on school trips; and
- Each child in the early years setting has a designated keyworker who liaises with parents to provide individual support for the child

Staff ratios

We will ensure that:

- Staff levels within the early years setting comply with statutory guidance and can meet the needs of the children provide suitable levels of supervision and keep them safe
- Parents are kept informed of staff members and numbers and
- Children are kept within staff sight and hearing at all times

For before and after school provision, we will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

Health

We will:

- Promote the health of children attending the early years provision
- Take necessary steps to stop the spread of infection
- Administer medicines only in line with the school's policy
- Take appropriate action where children are ill
- Ensure any meals provided are nutritious and prepared in a hygienic manner and
- Notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days

Health and safety and suitability of premises

We will ensure that all indoor and outdoor spaces and facilities used for early years are safe and fit for purpose and comply with school policies and standards for site safety and health and safety. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

We have specific procedures for ensuring that records of parents' details and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as procedures for dealing with uncollected children.

Managing behaviour

We will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened. However, staff will be permitted to use appropriate physical intervention in line with the school policy, local procedures and any plans which will be specific for each child depending on their situation. We will keep a record of any occasion where physical intervention is used and parents/carers will be informed on the same day, or as soon as reasonably practicable.

Attendance

Although statutory attendance requirements apply from the term after a child turns five, we recognise the importance of establishing strong attendance habits from the earliest stages of education. Regular attendance in early years lays the foundation for future learning, wellbeing, and safeguarding.

Expectations and Responsibilities

- Parents and carers are expected to ensure that children attend their early years provision regularly and punctually, even if attendance is not yet compulsory
- We will maintain accurate daily attendance records for all children in our provision
- Absences should be reported by parents/carers on the first day, with a clear reason provided. Unexplained or prolonged absences will be followed up in line with safeguarding procedures

Safeguarding and Early Intervention

- In line with Keeping Children Safe in Education (2026) and the EYFS statutory framework, persistent or unexplained absence in early years may be treated as a safeguarding concern
- We will make timely contact with parents and carers and escalate concerns where necessary, including the use of multiple emergency contacts and referrals to external agencies if appropriate
- Attendance concerns will be addressed through early help processes, with support offered to families to overcome barriers such as routines, transport, or health-related issues

Promoting Positive Attendance

- We will work in partnership with parents to promote the benefits of regular attendance from the outset, using induction meetings, newsletters, and parent workshops to reinforce expectations
- Staff are trained to recognise the impact of absence in early years and to respond with sensitivity and support

Procedures

Confidentiality

When considering confidentiality in relation to safeguarding, it is important that all stakeholders are aware that:

- Timely information sharing is essential to effective safeguarding
- Staff should proactively share information at the earliest opportunity where doing so will protect or promote the welfare of a child.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 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', Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025 contains 'safeguarding of children and individuals at risk' as a processing 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.
- Professional judgement will be used to ensure information shared is relevant, proportionate and appropriately contextualised.
- 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 the sexual violence or sexual harassment:
 - 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
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - 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, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - 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
 - 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 DSL (or a Deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff in Appendix 4

For further information, please see our Confidentiality Policy.

Information Sharing

Uley School is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data Protection Act 2018, UK General Data Protection

Regulations and the Data (Use and Access) Act 2025. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at the setting are aware that:

- 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- They should refer to Information Sharing for Safeguarding Practitioners 2024.

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk,
- by doing so will compromise a criminal investigation,
- It cannot be reasonably expected that a practitioner gains consent,
- or, if by sharing information it will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent.

There are also times when Uley School will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk). When in doubt Uley School will seek legal advice.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Multi-agency working

We recognise that education providers have daily contact with most children and families, and we are uniquely placed to identify concerns and, with partners as appropriate, address them early.

Uley Primary School will work together with appropriate agencies to safeguard and promote the welfare of children including identifying and responding to their needs. This is in compliance with statutory guidance [Working Together to Safeguard Children 2026](#).

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

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

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

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

Referrals in these cases should be made by the DSL (or Deputy DSL) to Children's Social Care in the Local Authority in which that child resides.

Uley Primary School will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes providing written reports and ensuring representation at inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings.

Additional considerations:

- Where a learner and/or their family is subject to an inter-agency child protection plan or a multiagency risk assessment conference (MARAC) meeting, the setting will contribute to the preparation, implementation, and review of the plan as appropriate.
- In situations where a child in care may be put on to part-time timetable, the school will consult with relevant agencies and the virtual school.
- If a crime has been suspected or committed that involved the bringing of an offensive weapon on to the school site, the setting will liaise with the Police who will consider a proportionate response.
- If there is a risk of harm, the police should be called via 999. For other concerns of criminality, the non-statutory guidance [when-to-call-the-police--guidance-for-schools-and-colleges.pdf \(npcc.police.uk\)](https://www.npcc.police.uk/media/1234567/when-to-call-the-police-guidance-for-schools-and-colleges.pdf) can be helpful or contact the local PCSO/School Link Officer/Neighbourhood Team.
- If we are managing a critical incident involving a child, the Education Safeguarding Team will be contacted educationsafeguarding@gloucestershire.gov.uk

A critical incident may be defined as any sudden and unexpected incident or sequence of events which cause trauma within a school community, and which overwhelms the normal coping mechanisms of that setting.

Critical Incidents affecting settings may include:

- Property failure
- The death of a pupil(s) or member(s) of staff through sudden accident, murder, terminal illness or suspected suicide.
- A serious accident involving pupils and setting personnel on or off premises.
- A violent attack or violent intrusion onto premises, e.g. involving an armed intruder or a bomb alert.
- Fire, flood, building collapse or major vandalism in setting.
- A hostage situation.
- A significant event in the community, e.g. transport accident, terrorism.

Whatever the scale of the incident, the effect on the individuals involved can be equally devastating.

Suspensions, permanent exclusions, and commissioning of Alternative Provisions.

(To be read in conjunction with the Behaviour Policy.)

Uley Primary School recognises that children who are suspended or permanently excluded may be vulnerable to a range of safeguarding concerns and that such actions can increase a child's risk of harm, exploitation, poor mental health, serious violence, criminal involvement, and becoming missing from education.

The school will ensure that safeguarding remains central to all decision-making relating to suspensions and permanent exclusions. Staff will consider whether a child's behaviour may be an indicator of unmet safeguarding needs, abuse, neglect, exploitation, trauma, mental health concerns, family difficulties, or special educational needs and disabilities (SEND).

Uley Primary School will exercise their legal duties in relation to their interventions. This includes:

- whether a statutory assessment should be considered in line with the principles of [Children Act 1989](#),
- that decisions are made in an anti-discriminatory manner in line with the [Equality Act 2010](#) (including having regard to the [SEND Code of Practice](#))
- and takes into consideration the learner's rights under the [Human Rights Act 1998](#).
- Interventions will be consistent with statutory guidance [School suspensions and permanent exclusions - GOV.UK \(www.gov.uk\)](#)

Actions to take

- Ensure safeguarding considerations form part of all decision-making processes.
- Consider whether behaviour is linked to an underlying safeguarding concern or unmet need.

- Involve the Designated Safeguarding Lead (DSL) where safeguarding concerns are identified, suspected, or known.
- Consider whether Family Help, Children's Social Care, mental health support, or other multi-agency interventions are required.
- Notify the Statutory Virtual School of a suspension or permanent exclusion of a Looked After Child
- Remain alert to the heightened risk of children who are suspended or permanently excluded becoming missing from education, experiencing child criminal exploitation, child sexual exploitation, or becoming involved in serious violence.
- Work collaboratively with parents/carers, the local authority, alternative providers, and other relevant agencies to promote the child's safety and welfare.
- Ensure that safeguarding arrangements remain effective throughout any suspension period and during transitions to alternative provision or other educational settings.
- Transfer child protection records, safeguarding files, risk assessments, and any other relevant welfare information securely and without delay when a child moves to another education provider following permanent exclusion.

The school acknowledges that a permanent exclusion should never be viewed solely as a behaviour matter and will take all reasonable steps to identify, assess, and address any underlying safeguarding vulnerabilities affecting the child.

Commissioning Alternative Provisions

When commissioning Alternative Provision, we will have regard to statutory and non- statutory guidance:

[Alternative provision - GOV.UK](#)

[Non-school alternative provision: voluntary national standards - GOV.UK](#)

[Education for children with health needs who cannot attend school - GOV.UK \(www.gov.uk\)](#)

In accordance with KCSIE 2026, if a pupil who is on role at Uley Primary School attends an Alternative Provision, we will continue to be responsible for the safeguarding of that pupil and ensure that we are satisfied that the provision is meeting the needs of the pupil.

Before one of our pupils attends an alternative provision, we will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff. The school will remind the provider of their duty to notify us of any staff changes or risks.

We understand that good practice highlights the importance of a member of school staff visiting the setting before placement is confirmed, to meet the provider, carry out visual checks and complete an Individual Placement Agreement.

We will ensure there is a clear agreement of roles and responsibilities to maintain safeguarding and daily monitoring of attendance arrangements for learners who are not taught on site.

An accurate record will be kept of where the child is, including all sites attended through Alternative Provision. When a child who is on role at Uley Primary School is attending an alternative provision, half-termly visits will be undertaken by a member of school staff to see that child to ensure the safety and suitability of the provision. Where possible, we will always look to use an alternative provision that are on Gloucestershire County Council's approved [Alternative Provision Catalogue](#).

If a safeguarding concern arises for a child within their Alternative Provision, the school will look to immediately review or end the placement.

Children Missing from Education

(To be read in conjunction with the Attendance Policy.)

A learner missing or absent from education is a potential indicator of abuse or neglect, or maybe an indicator of need for early help support. Staff should follow procedures for unauthorised absence and for dealing with children that go missing or are absent from education, particularly on repeat occasions. These should be reported to the DSL and reviewed in line with [2.3 Identifying and monitoring the needs of vulnerable learners](#).

Uley Primary School will follow the guidance detailed in [Children Missing Education \(2016\)](#), [Working together to improve school attendance 2026](#) and Gloucestershire County Council policy for Children Missing from Education. We will comply with submitting attendance returns to the Local Authority within the agreed timescales.

This will include notifying the local authority in which the child lives:

- of any pupil who fails to attend school regularly,
- or has been absent without the school's permission for a continuous period of 10 school days or more,
- or who has been recorded with code I (illness) and who the school has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness.

Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, Uley Primary School and other key professionals will work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child is subject to a child protection plan or has an Education, Health and Care plan this will need to be reviewed with the local authority, working closely with parents and carers. Education settings must complete the [deregistration form](#) when a pupil becomes Electively Home Educated.

Children at greater risk of harm

Whilst all children should be protected, all staff and governors recognise that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups.

- Children who need a social worker
- Children who are absent from education
- Elective home Education
- Children requiring mental health support
- Looked after children and previously looked after children
- Care leavers
- Young carers
- Children in the court system
- Children affected by parental offending/imprisonment.
- Children in Kinship Care
- Children with special educational needs, disabilities or health issues
- Children with medical conditions
- Children who are lesbian, gay or bisexual
- Children who are questioning their gender

There are also specific areas of safeguarding that can impact on children and families and their ability to keep safe:

- Child Exploitation- including both Child Sexual Exploitation and Child Criminal Exploitation and county lines, modern day slavery and trafficking
- Cybercrime
- Domestic Abuse
- Homelessness
- Honour or faith-based abuse (including Female Genital Mutilation and Forced Marriage),

- Online Safety
- Mental health
- Child on child abuse
- Radicalisation
- Serious Youth Violence
- Substance Misuse
- Private Fostering

Additional information about key safeguarding areas can also be found in Keeping Children Safe in Education Annex A (DfE 2026); the [NSPCC website - Types of Abuse](#).

Localised resources for education settings can be accessed through Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding in Education Partnership.

Recognising abuse and taking action

Staff should recognise that children may experience abuse, exploitation and violence outside the family home, including within peer groups, schools, communities and online environments.

Through training, all staff will be able to identify signs of abuse, neglect and exploitation, and shall be alert to the potential need for Family Help for a child who:

- Has a disability
- 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 organised 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, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing 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 as 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, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

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

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 is in immediate danger. **Anyone can make a referral.**
- Tell the DSL as soon as possible if you make a referral directly.
- See the diagram below, 'Actions to take when you are concerned about a child' for further details.

The following link may also be of use:

If a child makes a disclosure to you

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

- Stay calm and do not show that you are shocked or upset;
- Listen to and reassure them. Allow them time to talk freely and do not ask leading questions;
- Tell the child they have done the right thing in telling you. Explain that they will be supported and kept safe (a victim should never be given the impression that they are creating a problem by reporting, nor should they feel they should have reported it sooner);
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- Inform a DSL; Alternatively, if appropriate (ie the issue is time sensitive), make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.
- Write up your conversation and follow on actions using the school CPOMS system as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it;
- Ensure the DSL has been alerted to your CPOMS log so that it can be securely shared with key staff.
- Aside from the people directly involved, 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.

Dealing with a disclosure of abuse.

When a child tells me about abuse they have suffered, what must I remember?

Stay calm.

Do not communicate shock, anger or embarrassment.

Reassure the child. Tell them you are pleased that they are speaking to you.

Never promise confidentiality. Assure them that you will try to help but let the child know that you may have to tell other people in order to do this. State who this will be and why.

Do not ask "leading questions" or press for information. Use 'Tell Me, Explain to me, Describe to me' (TED) questioning.

Listen and remember.

Check that you have understood correctly what the child is trying to tell you, using their own language.

Praise the child for telling you. Communicate that they have a right to be safe and protected.

It is inappropriate to make any comments about the alleged offender.

Be aware that the child may retract what they have told you. It is essential to record all you have heard.

At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.

As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

Remember that records may be used as evidence in court proceedings and need to be factual and accurate.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

- *"The 6 R's" are helpful in understanding what professional's duties are in relation to responding to an incident.*

Recognise – Reassure – Respond – Report – Record – Refer (if necessary)

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 pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 2 of this policy.

Any member of staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- 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 purposes connected with labour or birth

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

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

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

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

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

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), the diagram below, ‘Actions to take when you are concerned about a child’ illustrates the procedure to follow if you have any concerns about a child’s welfare.

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

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

Weapons

Staff should report any concerns regarding a child carrying, threatening to use, or using a weapon. The DSL will assess risk to the child and others and implement an appropriate safety and support plan.

Family Help

Please refer to Our Offer of Family Help for more information.

Everyone needs help at some time in their lives and therefore an ethos of early intervention/ ‘Family Help’ is important for any school. We believe that early interventions for children or their families are more effective in promoting the welfare of children than reacting later.

Family Help means providing support as soon as a problem emerges.

Schools such as ours, are best placed to provide up-to-date guidance support and intervention on specific safeguarding issues when and if they arise. We will refer to appropriate agencies when help is required to support children, young people or families or to prevent harm. Families themselves should also feel empowered to make contact with the relevant professionals or agencies should they need help and support.

Our aim is to help pupils and families as early as possible when issues arise: 'offering the right help at the right time to stop any issues getting worse'. Family Help is an approach, not necessarily an action. It includes prevention education as well as intervention where necessary or appropriate. In some cases, immediate urgent action might be necessary if a child or young person is at risk of immediate harm.

All staff at Uley Primary School are aware of the Offer of Family Help. At all times all staff are asked to consider if there is any Offer of Family Help that we can make in order to help a child thrive. Parents/carers/guardians will also benefit from having the Offer of Family Help information so that they can make decisions about where to go for professional help or support or where to ask questions when any need arises for their family.

It should be noted that our Family Help support will be kept under constant review and consideration will be given to a referral to Children's Social Care if the child's situation does not appear to be improving. In order to do this, the school will work with other local agencies to identify children and families who would benefit from Family Help. To this end, school staff with designated responsibility for providing Family Help will:

- Undertake an assessment of the need for Family Help
- Make use of the graduated pathway for Family Help and service provided by the relevant Family Help Partnership
- Provide Family Help services e.g. School Nurse, Pastoral support teachers, Inclusion, Family Outreach Worker etc...
- Refer to appropriate services e.g. CYPS
- Ensure that pupils have a choice of staff available to them to listen to their concerns or needs, for example, emotional health needs. Where appropriate, the DSL will lead on community-based Family Help assessments and coordinate multi-agency support.

All staff will be supported in the following ways:

- Access to relevant training with a focus on how Family Help can support pupils
- Access to an up-to-date register of Family Help
- Access to GSCP website – Levels of Intervention
- Support from senior members of staff with specific training in emotional health and well-being

If anyone thinks a child or young person is at immediate risk of significant harm they should always call 999. Anyone can do this. In the case of needing medical help fast dial 111.

[when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#)

The Child Protection Referral Process

Multi-agency working - Working Together to Safeguard Children 2026

Everyone at Uley Primary School is committed to developing effective partnership working with relevant agencies in the best interest of children and young people. Effective multi-agency working and communication, helps to safeguard young people.

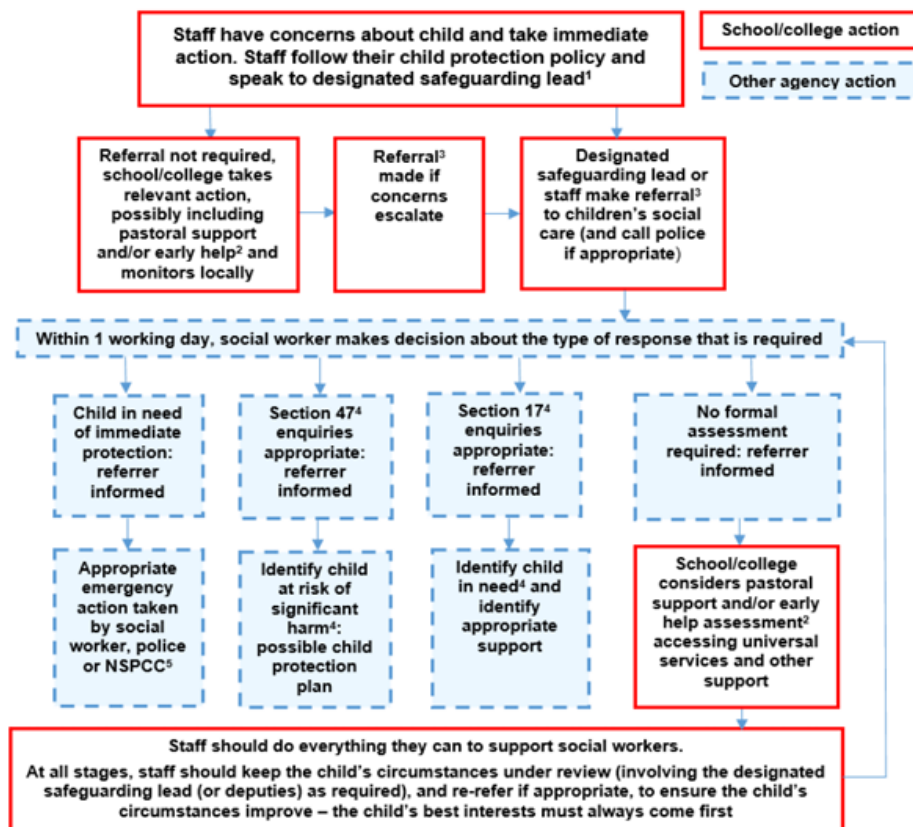
Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. It is important that staff understand their role in the three safeguarding partner arrangements and local arrangements.

We recognise the importance of referring concerns to Children’s Social Care and when doing so, considering what is known about the child’s wider context (contextual safeguarding).

The GSCP (Gloucestershire Safeguarding Children’s Partnership) website sets out all of the child protection referral processes and also all of the relevant forms. This is a live website and is regularly updated so should not be printed (www.GSCP.org.uk). KCSiE 2026 also provides clear guidance (see flow-chart below)

A flowchart setting out the actions taken where there are concerns about a child

Figure 1



Understanding the local referral process

The following link provides staff with the necessary information regarding advice and referral procedures - Gloucestershire Safeguarding Children Partnership (GSCP) - [Gloucestershire Safeguarding Children Partnership | Gloucestershire Safeguarding Children's Partnership](#)

If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children’s social care. Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ above). 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 Channel, the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.

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

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

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

If you have a Mental Health Concern

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, or physical health, problem or be at risk of developing one.

If you have a mental health concern that is also a safeguarding concern, speak to the DSL to agree a course of action. Staff are encouraged to make reference to the Department for Education guidance on mental health and behaviour in schools for more information.

Following up a concern

The agency who received the referral e.g. Social Care, should inform the referrer of their action. Where this does not happen promptly the referrer should re contact the agency to be assured that action is being taken or that alternative support is being recommended

- If after a referral the child's situation does not appear to be improving, the DSL should press for re-consideration
- It is essential that the school remains actively involved in support and plans even where another agency is taking the lead whether at Family Help, child in need or child protection level
- Where there is a difference of opinion with another agency and this cannot be resolved the GSCP Escalation guidance should be used.

Gloucestershire Encompass Commitment

As part of Uley Primary School's commitment to keeping children safe, we have signed up to implement the principles and aims of the Gloucestershire Encompass Model. Operation Encompass aims to support children and young people who are affected by domestic abuse.

Witnessing or experiencing domestic abuse is really distressing for a child or young person, who often see the abuse, hear it from another room, see a parent's injuries or distress afterwards, or can be physically hurt by trying to stop the abuse. As a result, following any domestic abuse incident being reported to the police, the Police will make contact with one of the Education Researchers within the Gloucestershire MASH, who will then on behalf of the police communicate relevant, necessary and proportionate information to nominated school staff. This will ensure that the school is made aware at the earliest possible opportunity and can subsequently provide support to children in a way that means they feel safe and listened to.

Each school has members of staff who have been fully trained in liaising with police and Children's Social Care when required, and will ensure that the necessary support is made available to the child or young person following the notification of a domestic abuse incident.

In signing up to Gloucestershire Encompass the Governing Body and Senior Leadership Team:

- Endorse the Gloucestershire Encompass Model and support the Key Adults in our school to fulfil the requirements of the Gloucestershire Encompass Protocol
- Promote and implement Gloucestershire Encompass processes and use these in accordance with internal safeguarding children processes
- Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection.

Informing Parents/ Carers/ Guardians

Where appropriate, we will discuss any concerns about a child with the child's parents/carers/guardians. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents/carers/guardians about any such concerns following consultation with the DSL. If we believe that notifying the parents/carers/guardians 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/carers/guardians of all the children involved.

Allegation Management – Pupils Responding to incidents of child-on-child abuse (including harassment and violence) and extra-familial safeguarding concerns

Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

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
- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents,
- abuse in intimate personal relationships between peers (teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- causing someone to engage in sexual activity without consent
- initiation/hazing type violence and rituals.

We recognise that, for some (but not all) forms of child-on-child abuse, it is more likely that girls will be victims and boy perpetrators; however, all child-on-child abuse is unacceptable and will be taken seriously regardless of the sex of those involved (KCSIE 2026, para 191).

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, who may themselves need support; it is preventable, and staff have a responsibility to report any concerns to the DSL regardless of whether the incident happened on or off site.

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

Consequently, child-on-child abuse is dealt with as a safeguarding issue and recorded as such, not managed through the systems set out in the behaviour policy.

- Any child who may have been victimised and/or displayed such harmful behaviours, along with any other child affected by child-on-child abuse, will be supported through the setting's safeguarding team and pastoral system and the support will be regularly monitored and reviewed.
- We will address inappropriate behaviour (even if it appears to be relatively innocuous) as this can be an important intervention that may help prevent problematic, abusive and/or violent behaviour in the future.
- We acknowledge that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Staff maintain an attitude of 'it could happen here' where safeguarding is concerned.

We minimise the risk of child-on-child abuse by providing:

- a relevant, effective curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation, and the mandatory teaching of Relationship Education, Relationship and Sex Education and Health Education,
- established/publicised systems for children to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously,

See Appendix 2 for more information about child-on-child abuse.

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

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

- It should be reported to the Senior Management Team, who are also DSL's, in the same way as all other abuse or suspected abuse as explained later in this policy.
- You must record the allegation on CPOMS, but do not investigate it unless directed to by a DSL.
- 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 if required, 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 children 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 children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Please see our Behaviour Policy and our Anti-Bullying for further information on managing 'child-on-child' abuse.

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

Child-on-child abuse is preventable. Early identification, timely intervention and evidence-based support are key to preventing harmful behaviours escalating (KCSiE).

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse

- Ensure staff reassure victims that they 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 if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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 on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing 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 LA 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

Sharing of nudes and semi-nudes (‘sexting’)

Uley Primary School recognises that making or sharing AI-generated sexual imagery involving children requires the same safeguarding response as genuine imagery.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos including AI-generated images, deepfakes and deep nudes, which are computer-generated images that otherwise appear to be a photograph or 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 pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive 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 pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the 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 pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/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. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 2 for more information on assessing adult involved incidents
- 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 pupil in the images or videos is under 13
- The DSL has reason to believe a pupil 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 Head Teacher 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 pupils involved (if appropriate).

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

Informing parents/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 pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing curriculums. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

This processes on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Reporting systems for our pupils

At Uley Primary School, we believe that it is important to develop appropriate strategies in order to prevent the issue of child-on-child abuse rather than manage the issues in a reactive way.

Firstly, and most importantly is the recognition that child on child can occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

This can be supported by ensuring that we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. We also offer non-verbal alternatives to reporting such as 'Helping Hands' available on the back of all classroom doors for children to write their worries and deliver to their chosen member of staff. This is strengthened through a strong and positive PSHE/SMSC curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment, it is necessary to ensure that the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people, including use of inappropriate language and behaviour towards one another. In order to create such an environment, leaders recognise the importance of whole staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised, it may result in a young person seeking no further help or advice.

It is important that signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. The school makes use charities such as ChildLine and the NSPCC for pupil support.

Finally, it is important that pupils have a voice in our school. Our school council encourages all children to follow our vision of Live, Learn and Flourish and our 4 core values Friendship, Wisdom, Trust and Compassion. By doing this, we feel that a positive ethos in school will be created and a culture where all children understand the boundaries of behaviour.

Child-on-child sexual harassment and sexual violence

The DSL will follow local and national guidance when there has been signs, reports or concerns of Harmful Sexual Behaviour (HSB), child-on-child sexual harassment and sexual violence having due regard of Part 5 of Keeping Children Safe in Education. This will include liaising with other professionals to develop robust risk and needs assessments and multi-agency safety planning with appropriate specialist targeted work for children who are identified as posing a potential risk to other children.

The Gloucestershire [Harmful Sexual Behaviour Protocol – Gloucestershire Safeguarding Children Partnership](#) should be utilised to inform assessment of risk and what actions to subsequently take. Any assessments need to take an extra-familial safeguarding approach to consider risks posed by any wider environmental factors present in a child's life. The DSL will record specifically the time and location of the incident, and any action required to make the location safer.

Uley Primary School will consider sexual harassment in broad terms. Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

When an incident involves an act of **sexual violence** (rape, assault by penetration, or sexual assault) the starting point is that this should be passed on to police **regardless** of the age of criminal responsibility (10 years old). This must be reported directly via 101 for recording purposes and accountability. A concurrent referral to social care must also be made.

Where a report includes an online element, we will follow Searching, screening and confiscation at school - GOV.UK (www.gov.uk) and [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

- The NSPCC has a dedicated helpline 0800 136 663 to provide children who are victims of sexual abuse in schools with appropriate support and advice. The helpline also provides support to parents and professionals.
- The Lucy Faithfull Foundation can provide support to anyone with concerns about child sexual abuse [Helpline - Stop It Now](#)
- The Lucy Faithfull Foundation's, Shore Space, offers a confidential chat service for teenagers worried about sexual behaviour. [Home - Shore](#)

Extra familial safeguarding approach to child-on-child abuse:

Uley Primary School will minimise the risk of child-on-child abuse by understanding extra-familial risks and will increase safety in the contexts of which harm can occur – this can include the school environment itself, peer groups and the neighbourhood.

Following any incidents of child-on-child abuse, the DSL will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. This can include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics in the curriculum.

Responding to allegations of abuse made against adults working in the setting

Staff must report any concerns or allegations about a professional's behaviour (including supply staff, trainee teachers, volunteers, and contractors and those from organisations or individuals using the school premises) where they may have:

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

On being advised of an allegation which meets any or all of the above criteria, the designated safeguarding lead / case manager (schools) should contact the [Local Authority Designated Officer \(LADO\)](#) within **ONE working day**

Immediate action must be taken:

- Do not speak to the individual it concerns.
- Allegations or concerns about colleagues and visitors must be reported directly to the Head Teacher who will follow guidance in Keeping Children Safe in Education (DfE 2026, Part four: Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors).
- If the concern relates to Head Teacher it should be reported to the Chair of Governors, who will liaise with the [Local Authority Designated Officer \(LADO\)](#) and they will decide on any action required.
- If there is a conflict of interest which inhibits this process of reporting, staff can report directly to the LADO.
- If allegations are regarding a member of supply staff, the school will take the lead and progress enquiries with the LADO, whilst continuing to engage and work with the employment agency.
- Where allegations concern a trainee teacher, the school will progress the matter with the LADO in the same way as for any other member of staff, while continuing to liaise with the initial teacher training (ITT) provider (KCSIE 2026, Part Four).
- [If concerns relate to the Head Teacher who is the sole proprietor of an independent school, allegations should be referred to the LADO – remove if this statement is not applicable]
- Allegations regarding foster carers should be referred to the LADO on the day that the allegation is reported. The allocated social worker should also be informed on the day. The school should not undertake any investigation unless the LADO advises this.

Low level concerns

This should be read in conjunction with the staff code of conduct and Keeping Children Safe in Education (2026). A low-level concern is not insignificant. This process should be used in events where a concern about professional conduct does not meet the threshold set out at the beginning of this section.

The setting provides a clear procedure for sharing low level concerns. It is best practice for settings to have a separate Low Level Concerns Procedure, please refer to our Low Level Concern Policy Appendix 6.

- Reports should be made to the DSL (or the head teacher if it is regarding the DSL).
- Uley Primary School creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.
- The DSL will address unprofessional behaviour and support the individual to correct it at an early stage providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- The DSL will review and correct any deficits in the setting's safeguarding system.

Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded. If there is any doubt about what should be recorded, staff should discuss it with the DSL (or DDSL).

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Confidential information and records will be held securely and only available to those who have a right or professional need to see them. These are stored in the Head Teacher's Office.

Safeguarding records on CPOMS, relating to individual children, will be retained for a reasonable period of time after they have left the school.

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

Where appropriate, safeguarding information regarding risks posed to others should be shared in advance of transfer to another school. Confirmation of receipt should be obtained whenever safeguarding records are transferred.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

Appendix 5 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Support

Supporting the child

The child's wishes - Where there is a safeguarding concern, those involved should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Systems are in place for children to express their views. Ultimately, all systems and processes should operate with the best interests of the child at their heart.

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that, in response to some incidents for example 'sexual violence', for a child who is abused or witnesses violence there may be a number of physical and mental health implications which may require support thereafter.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will therefore support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying;
- Promoting a caring, safe and positive environment within the school;
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children and offering Family Help;
- Notifying Social Care as soon as there is a significant concern.

Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers 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 or carers 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)

Pupils with Special Educational Needs (SEN), Disabilities or Health Needs

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 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 condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- 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 these pupils. Please see our Inclusion and SEND Policy and SEN Information Report for further information.

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

Pupils with a Social Worker

Pupils 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 pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

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

We have appointed a Designated Teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher 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 virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

Pupils who are lesbian, gay or bisexual

Uley Primary School recognises that being lesbian, gay or bisexual is not itself a safeguarding risk factor. However, children who are or are perceived to be lesbian, gay or bisexual may experience discriminatory bullying and additional vulnerabilities. See our Behaviour and Anti-Bullying Policies for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that these children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Additional pastoral support may be available.

Gender-questioning children

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

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

- engage parents/carers as a priority and give their views considerable weight, except in the rare circumstances where doing so would place the child at greater risk – in which case the DSL will determine what action is needed to safeguard the child before parents/carers are contacted;
- take a careful approach, recognising that social transition is an active intervention that may have significant effects on a child's wellbeing and longer-term outcomes, and that primary-aged children in particular are very unlikely to be supported in a full social transition;

- consider what is in the best interests of the child and of other children, drawing on clinical and non-clinical professional advice (for example from the SENCo) where relevant, and taking into account any wider health issues or neurodiversity;
- document the decision-making process and keep records, including where a request is not agreed to ensure that toilets, changing rooms, and boarding/residential accommodation designated for one biological sex are not made available to a child of the other biological sex, including as a form of social transition;
- comply with the setting's duties under the Equality Act 2010 and the Human Rights Act 1998, considering whether any policy would place a gender-questioning child at a disadvantage relative to other children, and linking this consideration to the setting's wider inclusion and equality processes (see section 3, Equalities Statement, of this policy).

Safeguarding Children with medical conditions

An incident relating to the management of a child or young person's medical condition (including allergies) would not, in itself, warrant a referral to local safeguarding partners. However, we will make a referral to statutory services where an incident indicates the child may be at increased risk of neglect, abuse or exploitation connected to their medical condition – for example, where relevant medical information is not provided to the setting, or a child is repeatedly sent without essential medication.

Further information: DfE statutory guidance Supporting pupils at school with medical conditions, and Allergy safety in schools (KCSIE 2026, para 250).

Specific actions to take on key safeguarding areas:

General or national guidance is not included here. A summary of specific duties are in [Keeping children safe in education 2026 Annex A](#). It is recommended that school and college leaders and those staff who work directly with children should read this Annex. Access to local guidance can be found here: [Policies and Procedures – Gloucestershire Safeguarding Children Partnership](#)

In recognition that the threshold of child protection is 'likely to suffer' significant harm, Uley Primary School may need to make a referral to children's social care. Where possible, this will involve notifying the parent/carer if it does not place the learner or others at further risk of harm or compromise a criminal investigation. In all other circumstances information will be shared in line with section [2.2 Information Sharing](#).

It is also important to recognise the importance of liaising with other education settings who may have siblings attending. It is likely that they may hold additional information which will support early identification of harm and in turn develop your assessment of need.

Weapons and Serious violence

We recognise that success in learning is one of the most powerful indicators in the prevention of youth crime.

All staff are aware of the indicators, which may signal 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 educational 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 and may be at risk of criminal exploitation.

- Any member of staff who becomes aware that a pupil is carrying a weapon, has used a weapon, is in possession of a weapon, or has expressed an intention to use a weapon must report this immediately to the Designated Safeguarding Lead (DSL) or a deputy DSL.
- Concerns relating to weapons will be treated as safeguarding concerns and assessed by the DSL in line with the school's child protection procedures.
- The DSL will consider appropriate action, including risk assessment, parental involvement, referrals to children's social care, Early Help, and/or liaison with the police where appropriate.

- The school recognises that possession or use of a weapon may be an indicator of serious violence, child criminal exploitation, gang involvement, or other safeguarding concerns and will respond accordingly.

Child Exploitation – both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Uley Primary School will ensure that early help intervention is provided as soon as a concern of exploitation is identified. We will utilise the GSCP [Harm Outside the Home – Levels of Intervention Decision Making Support Tool](#) and seek advice from targeted services to consider what support may be available. The learner and their families will be part of any planning and interventions.

- If the learner is at risk of CSE or there is intelligence which indicates that the learner or peer group are at risk of CSE, Uley Primary School will share information with [Force Intelligence Bureau](#) (FIB) (the police). This information will support proactive activity to disrupt criminal activity in relation to sexual exploitation. [Report child sexual exploitation | Gloucestershire Constabulary](#)
- If the learner is at risk of CCE information should be shared with the police [Tell us about vulnerable or exploited people, exploiters, or organised crime | Gloucestershire Constabulary](#) Targeted support may be available to disrupt learners from getting involved with criminality.
- Agencies will share 'Missing persons' notifications (when a learner is reported missing from home or care) with education settings with a view to support them to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. These should be stored securely on the learner's Safeguarding/Child Protection file.

Further support and information can be found here: [Preventing Child Sexual Exploitation | The Children's Society](#)

Domestic Abuse

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass is a national operation where local police forces notify education settings when the police are called to an incident of domestic abuse. Education Settings will be notified when the police have responded to a domestic abuse incident. This will enable the education setting to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. When a setting is concerned about the amount of police notifications they receive or disclosures of domestic abuse they should consider seeking further advice and completing an Early Help/Family Help Assessment or DASH to support the family.

The National Domestic Abuse Helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. [Homepage - National Domestic Abuse Helpline](#) provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [How to Protect Children From Domestic Abuse | NSPCC](#)
- [What is domestic abuse? - Refuge](#)
- [Safe Young Lives | Young people & domestic abuse - SafeLives](#)
- [Domestic abuse: specialist sources of support - GOV.UK](#)
- [Home : Operation Encompass](#)
- [Gloucestershire Domestic Abuse Support Service | GDASS](#)

Female Genital Mutilation

Mandatory reporting duty: [Click here for government guidance](#)

There is a legal duty for all professionals undertaking teaching work to report known cases of FGM to the police via 101. This is when they:

1. are informed by a girl under 18 that an act of FGM has been carried out on her; or
2. observe physical signs which appear to show that an act of FGM has been carried out on.

These cases must be referred to the DSL who will support staff to carry out their duty. It is also advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care, so an assessment of need and support is concurrently considered.

Child Sexual Abuse

Mandatory reporting duty:

There is a legal duty for those taking part in regulated activity to report if they:

- are told that a child (person under the age of 18) has been sexually abused, either by a child or an adult involved
- witness child sexual abuse in person
- see or hear it in the form of images, videos or audio recordings.

These cases must be referred to the DSL who will support staff to carry out their duty. It is also advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care, so an assessment of need and support is concurrently considered.

Generative AI

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

The Prevent Duty.

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

The guidance is set out in terms of four general themes:

- risk assessment,
- working in partnership,
- staff training,
- IT policies.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child:

- under the age of 16 years (under 18, if disabled)
- by someone other than a parent or close relative (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

- with the intention that it should last for 28 days or more.

Cases of private fostering arrangements must be reported to children's social care to ensure that needs are adequately made.

Statutory guidance states that this should be done at least 6 weeks before the arrangement is due to start or as soon as you are made aware of the arrangements. Not to do so is a criminal offence.

Further support and reasonable adjustments should be made by the education setting to promote achievement of positive educational outcomes.

Young Carers

A young carer is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances. Support for Young Carers can be accessed by completing an EHA.

Sport and single-sex provision

KCSIE 2026 sets out that schools, further education institutions and 16-19 academies (covered by Part 6 of the Equality Act 2010) may separate children by biological sex for single-sex sport and competitive activity where physical strength, stamina or physique would otherwise create a safety or fairness disadvantage. Some sports may need to be single-sex from a certain age for safety reasons, in which case there must be no exceptions. Requests relating to how a child participates will be considered against the guidance on 'considering requests for support with social transition', taking into account the best interests of the child, the impact on other children, and the aim of creating a safe and fair environment (KCSIE 2026, paras 95-98).

Toilets, changing rooms /residential accommodation

Uley Primary School will not allow children into toilets, changing rooms or overnight/boarding accommodation designated for the opposite biological sex, including in response to a request to support social transition. Separate toilets are provided for boys and girls aged 8 and over, and separate changing accommodation for pupils aged 11 and over, in line with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Where a gender-questioning child does not wish to use the facilities designated for their biological sex, Uley Primary School will consider whether an alternative, self-contained facility can be provided without compromising single-sex provision for other children. Any such arrangements will be recorded, communicated appropriately, and reviewed regularly. [Delete/adapt the boarding and residential accommodation references if not applicable to your setting.] (KCSIE 2026, paras 105-116 and 197-202).

Complaints and concerns about school safeguarding policies

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 4).

Other complaints

Other types of safeguarding-related complaints– for example, those relating to how a member of staff has dealt with a safeguarding concern, will be managed through the procedures set out in our Compliments and Complaints Policy which can be found on our website.

Related Policies

Safeguarding and child protection is at the core of all that we do at Uley Primary School and therefore relates to all policies.

There are particularly important links between this Child Protection Policy and the following policies.

This policy should be read in conjunction with:

- Offer of Family Help
- Acceptable Use Agreement
- Attendance Policy
- Equality Objectives
- Educational Visits
- Health and Safety Policy
- Relationships (Behaviour) Policy (Including Anti-Bullying and Red Behaviour Conduct Statement)
- Positive Handling – with the Behaviour Policy
- Staff Behaviour Policy (GCC & Schools Employment Handbook adopted)
- Guidance for Safer Working Practice Feb 2022
- Low-Level Concerns Policy
- Code of Conduct
- School Security Policy
- Inclusion and Special Educational Needs Policy
- Accessibility Plan
- Intimate Care Policy
- Supporting Pupils with Medical Conditions
- Data Protection Policy
- Online safety Policy
- Walking to School Policy
- Picking up and dropping off Policy
- Disclosure and Barring Service checks (DBS)
- Central record of recruitment and vetting checks
- Whistle-Blowing
- SHE SRE
- Compliments and Complaints Policy
- First Aid
- Teaching and Learning Policy
- Individual Curriculum Policies

Monitoring and Evaluation

Our Safeguarding & Child Protection Policy and Procedures will be monitored and evaluated on an annual basis.

To support this monitoring, the following sources of information will be used:

- Designated Safeguarding Governor visits to the school
- Scrutiny of Single Central Record (SCR)
- DSL 'drop ins' and discussions with children and staff
- DSL meets
- Completion of the GSCP annual Section 175 audit
- Pupil surveys and questionnaires, including the Gloucestershire on-line pupil survey (OPS)
- Scrutiny of Attendance data
- Scrutiny of a range of risk assessments
- Scrutiny of GB minutes
- Scrutiny by the school leadership team and Governing Body of bullying/racist/behaviour incidents/referrals on a termly basis
- Annual review of filtering and monitoring effectiveness.
- Review of online safety incidents and emerging risks, including AI-related concerns.
- Review of parental concerns, complaints, Parent Forum and parent questionnaires
- Review of training undertaken by all staff and volunteers
- Information and updates from GSCP training events / DSL forum

Links

<https://www.gloucestershire.gov.uk/gscp/>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>
<https://www.nspcc.org.uk/>
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>
<https://www.gov.uk/guidance/teaching-about-mental-wellbeing>

APPENDICES

Appendix 1 Policy Statement on the Recruitment of Ex-Offenders

Exemption from the Rehabilitation of Offenders Act 1974

Ex-offenders have to disclose information about spent, as well as unspent convictions if the job for which they are applying is exempted from the Rehabilitation of Offenders Act 1974.

How this affects school-based jobs?

All school-based jobs are exempt from the Rehabilitation of Offenders Act as the work brings employees into contact with children who are regarded by the Act as a vulnerable group. Applicants for school-based jobs must, therefore, disclose all spent and unspent convictions.

All applicants who are offered employment in a school will be subject to a criminal record check from the Disclosure and Barring Service before an appointment is confirmed. This will include details of cautions, reprimands and warnings as well as spent and unspent convictions. An enhanced DBS (check) may also contain non-conviction information from local police records which a chief police officer thinks may be relevant.

Having a criminal record will not necessarily bar someone from working in a school.

Criminal records will be taken into account for recruitment purposes only when the conviction is relevant.

Any DBS that contains information (caution, reprimand, conviction, soft information) will be referred to Gloucestershire County Council DBS Panel for consideration.

Schools undertake not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

When reaching a recruitment decision GCC DBS Panel will take the following factors into account:

- Whether the conviction or other matter revealed is relevant to the position in question
- The seriousness of any offence or other matter revealed
- The length of time since the offence or other matter occurred
- Whether the applicant has a pattern of offending behaviour or other relevant matters
- Whether the applicant's circumstances have changed since the offending behaviour or the other relevant matters, and
- The circumstances surrounding the offence and the explanation(s) offered of the offending person.

There are, however, particular offences that would automatically prevent an offer of employment in a school being confirmed. These include:

- Rape
- Incest
- Unlawful sexual intercourse
- Indecent assault
- Gross indecency
- Taking or distributing indecent photographs

Other offences which make it unlikely (although not automatic) for an offer of employment in a school to be confirmed include the following:

- Violent behaviour towards children or young people
- A sexual, or otherwise inappropriate relationship with a pupil (regardless of whether the pupil is over the legal age of consent)

- A sexual offence against someone over the age of 16
- Any offence involving serious violence
- Drug trafficking and other drug related offences
- Stealing school property or monies
- Deception in relation to employment as a teacher or at a school, for example false claims about qualifications, or failure to disclose past convictions
- Any conviction which results in a sentence of more than 12 months' imprisonment
- Repeated misconduct or multiple convictions unless of a very minor nature.

If appropriate, applicants will be invited to discuss disclosure information before a final recruitment decision is made.

It may be necessary at times to update the records of existing employees. Existing employees who are found to have criminal records will not be dismissed as a matter of course. Each case will be considered on its merits, and an assessment of risk and relevance will be involved.

Appendix 2: types of abuse and specific safeguarding issues

The NSPCC has produced a series of Expert Insight videos, [Expert insight videos | NSPCC Learning](#) where experts talk about key child protection topics and share learning from their safeguarding experiences.

Abuse and neglect are defined as the maltreatment of a child or young person whereby someone may abuse or neglect a child by inflicting harm, or by failing to prevent harm. They may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. For children with Special Educational Needs and Disabilities (SEND) additional barriers can exist when identifying abuse and neglect, these include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- being more prone to peer group isolation than other children.
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, schools and colleges should consider extra pastoral support for children with SEND (KCSIE, 2026).

The following are the definition of abuse and neglect as set out in Keeping Children Safe in Education 2026, however, the ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact on the welfare and development of our children and where we have concerns that a child or young person may be at risk of abuse and neglect (one or more categories can apply) to take appropriate action as early as possible.

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

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

Neglect: 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved,

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

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 cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse: Sexual abuse: involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

The Centre of expertise on child sexual abuse has useful resources and training [Home | CSA Centre](#).

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

Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's 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 a 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.

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
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value 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 of 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 organised 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 taken 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 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. 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

Children who are absent from education

A child being absent from education, particularly repeatedly, 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 be absent or become missing 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 are absent 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 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 absent, 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.

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 other advantage of the perpetrator or facilitator, and/or through violence or the threat 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 missing 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.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse 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. 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. 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.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also 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. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving

harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

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. It can be physical, sexual, financial, psychological 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 and affect their health, wellbeing, development and ability to learn.

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 (usually the designated safeguarding lead) before the child or children arrive at school the following day. In Gloucestershire, this is called 'Operation Encompass'.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

A girl:

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

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

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

A girl:

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

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

Forced marriage

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

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

Preventing radicalisation

Radicalisation refers to the process of 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 and 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; or
- 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll 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 from becoming 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 pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

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

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

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

Staff should always take action if they are worried.

Sexual 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) attends the same school.

If a victim reports an incident, it is essential that staff 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 we identify any patterns
- 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 the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not 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 or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

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

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 in using our GDPR signing in system and wear a visitor's lanyard and badge for the duration of their visit.

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 appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

Non-collection of children

If a child is not collected at the end of the session/day, we will make contact with contacts registered on our database. Children not collected after office hours, will be placed into After School Club (charges will apply for repeat incidences). We may gain advice from external agencies should non-collection be a regular occurrence.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Please see our Attendance and School Security Policies for further information.

Appendix 3 – Safeguarding Job Description

Job description for the role of the Designated Safeguarding Lead:

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Microsoft Teams or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities.

To ensure continuity of safeguarding responsibilities, schools should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. Schools and colleges have the flexibility and discretion in how these arrangements operate, provided safeguarding responsibilities remain appropriately covered. It would be good practice that, whenever the DSL is unavailable, there is a clear, reliable, and known arrangement in place so that concerns can be raised. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care,
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme,
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff,
- act as a point of contact with the safeguarding partners,

- liaise with the Head Teacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019,
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member,
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically,
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health,
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances, and
- work with the Head Teacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes:
 - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information.

Records should include:

- a clear and comprehensive summary of the concern,
- details of how the concern was followed up and resolved, and
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in Parts one and two of this guidance.

Appropriate arrangements should be in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Where child protection files are transferred, the exporting school or college should include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs.

Particular care should be taken to distinguish between current safeguarding concerns and historic information, ensuring that past issues are presented with appropriate context. For example, where a file contains extensive historical information, a concise summary of current risk and relevant context is likely to support more effective safeguarding than the transfer of unstructured records alone.

Receiving schools and colleges should ensure that safeguarding information is reviewed by an appropriately trained member of staff so that key risks and needs are clearly understood. Safeguarding information should be used to support, not disadvantage, the child.

Where the receiving school or college considers that safeguarding information is unclear or incomplete, it should seek clarification where necessary to support effective safeguarding.

They should also ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required. It will then be for the DSL to consider what other information should be shared with other relevant staff and when this should be shared.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. It would be good practice for a conversation to take place at the appropriate and relevant points between the designated safeguarding leads at both settings, where there are issues or concerns to ensure information is being actively considered and acted upon.

Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff,
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this,
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this,
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads (and any deputies) with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements¹⁶⁰,
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so,
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children,

- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes,
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers¹⁶¹,
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners,
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation,
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college,
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online,
- obtain access to resources and attend any relevant or refresher training courses, Full details in Chapter one of Working Together to Safeguard Children. Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children. ¹⁸⁶ and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead (and deputies) in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead (and deputies) should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners,
- understand relevant data protection laws, and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Appendix 4: Allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section is based on 'Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside 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 while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Head Teacher, or the chair of governors where the Head Teacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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 our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused 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 there 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/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the Local Authority's HR Team and 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, or to cause harm to the subject of the allegation
- **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 case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible the school 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 teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, 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 LADO 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. The same will apply if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will 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 school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

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 case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

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).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain 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 found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager 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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

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: concerns that do not meet the harm threshold – see also Appendix 6 Low Level Concerns

The section is based on 'Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – 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 designated officer at the local authority

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

- Being overly 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

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially 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 Head Teacher 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 Head Teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Conduct Policy and Low-Level Concerns Policy. The Head Teacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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, 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 5: safer recruitment and DBS checks – policy and procedures

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

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken including online checks
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- A copy of, or link to, our child protection and safeguarding policy
- A copy of, or link to, our Employment of Ex-Offenders Policy - within this Safeguarding Policy Appendix 1
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms we will use:

- The Gloucestershire County Council approved form.

Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - o If they have a criminal history
 - o Whether they are included on the barred list
 - o Whether they are prohibited from teaching
 - o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - o Any relevant overseas information
 - o If they are known to the policy and children's local authority social care and
 - o If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

Shortlisted candidates will be informed that the school will carry out online checks as part of the due diligence process to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will aim to 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 Head Teacher 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 enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check 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. These could include, where available:
 - o For all staff, including teaching positions: criminal records checks for overseas applicants
 - o For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

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

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

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 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

Governors

All governors have an enhanced DBS check without barred list information.

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

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

Appendix 6 Low Level Concerns Policy

Introduction

This policy should be read in conjunction with school's Child Protection & Safeguarding Policy and our Staff Code of Conduct. This 'Low-level Concerns Policy' (a safeguarding concern or allegation that does not meet the harm threshold) is based upon the statutory guidance 'Keeping Children Safe in Education 2026' (KCSiE 2026), the expectations within 'Guidance for safer working practice for those working with children and young people in education settings' 'Developing and Implementing a Low-level Concerns Policy 2021'. These documents are referenced throughout the policy.

Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, and recorded and dealt with appropriately, is crucial. If implemented well this should encourage an open and transparent culture, enabling our school to identify concerning, problematic or inappropriate behaviour early, minimising the risk of abuse and ensuring that adults working in the school are clear about professional boundaries and act within them, in accordance with the ethos and values of Uley Primary School

Behaviour which is not consistent with the standards and values of Uley C. of E. Primary School and which does not meet our expectations specified in our staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse. Where a concern about an individual's behaviour meets the threshold of an allegation, clear guidance exists to support the member of staff in responding to these concerns.

It is important to recognise that, in practice, the words 'allegation' and 'concern' can be and are used interchangeably by different people. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable to the Local Authority Designated Officer - LADO), or, on the other, it does not meet the harm threshold (in which case it should be treated as a Low-level concern).

Purpose of a low-level concerns policy

This policy enables all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour with the Head Teacher. If the Head Teacher is absent, the concern should be shared with another DSL.

Safeguarding and promoting the welfare of children is everyone's responsibility. The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our staff code of conduct, are constantly lived, monitored and reinforced by all staff.

In order to achieve this purpose, Uley Primary School will:

- Ensure that 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.
- Recognise the importance of professional boundaries and when to report.
- Empower staff to share any low-level concerns with the Head Teacher and to help all staff to interpret the sharing of such concerns as a neutral act.
- Address unprofessional behaviour and support the individual to correct it at an early stage.
- Identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the LADO.
- Ensure all concerns that are raised are handled sensitively and proportionately.
- Help identify any areas for development in the organisation's safeguarding system as well as any training needs.

Allegations that may meet the harm threshold

The term 'allegation of harm' means that it is alleged that a person who works with children meets the harm threshold as specified below:

- behaved in a way that has harmed a child or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Staff should follow the Allegations Management Procedure set out in our Child Protection (Safeguarding) Policy and ensure all allegations are reported to the Head Teacher or if the allegation concerns the Head Teacher, the referrer should contact the Chair of Governors, or the LADO immediately.

Concerns that do not meet the harm threshold: low-level concerns

KCSiE 2026, states that, as part of their whole school approach to safeguarding, schools should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college are dealt with promptly and appropriately. This policy therefore applies to all adults working at Uley Primary School, including employees, supply staff, trainee teachers, volunteers, governors and contractors.

The term 'Low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the harm threshold as set out in Section 3. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO.

Staff do not need to be able to determine in each case whether their concern is a Low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff have shared what they believe to be a Low-level concern, that determination should be made by the Head Teacher and responded in line with this policy.

A culture of vigilance and staff training on low-level concerns

Uley Primary School has a culture of openness and trust is fostered within the organisation so that staff can share any concerns about the conduct of colleagues and be assured that these will be received and handled in a sensitive manner.

If we educate adults to be informed about, and to identify concerning, problematic or inappropriate behaviour, rather than think they can recognise dangerous people, they can be prepared to act when they observe behaviour which violates our culture.

Sharing low-level concerns

It is critical that all Low-level concerns are received by the Head Teacher. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost.

It is important that Low-level concerns are shared with the Head Teacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern where it relates to a specific incident.

Whilst staff should share information with the Head Teacher as soon as reasonably possible, it should also be emphasised that it is never too late to share a low-level concern and a delay should never be seen as a barrier to sharing

If the Head Teacher is absent for any reason, low level concerns should be shared with the Deputy DSL, who will inform the Head Teacher immediately on return.

In the event of concerns about the Head Teacher, these should be referred to the Chair of Governors, chair@uley.gloucs.sch.uk

Anonymity

If the staff member who raises the concern does not wish to be named, then the Head Teacher will respect that person's wishes as far as possible.

There may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity will never be promised to members of staff who share low-level concerns. Where possible, we will try to encourage staff to consent to be named, as this will help to create a culture of openness and transparency.

Self-reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff Code of Conduct.

Self-reporting in these circumstances can be positive for a number of reasons:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived and, crucially,
- It is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

In line with KCSiE 2026, Uley Primary School will ensure that there is an environment where staff are encouraged and feel confident to self-refer

Sharing and recording of low-level concerns

Staff will be given the option of sharing their Low-level concern verbally with the Head Teacher in the first instance, or by completing a simple low level concerns form.

Where the Low-level concern is provided verbally, the Head Teacher will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion.

Sound professional judgement will be exercised by the Head Teacher in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern and their role should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised.

The record will include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record must be signed, timed and dated.

Responding to a low-level concern

Once the Head Teacher has received the low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- speak to any potential witnesses (unless advised not to do so by the LADO /other relevant external agencies, where they have been contacted);

- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO / other relevant external agencies, where they have been contacted);
- review the information and determine whether the behaviour:
 - is entirely consistent with their staff code of conduct and the law;
 - constitutes a low-level concern;
 - is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO;
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO
 - in and of itself meets the threshold of an allegation and should be referred to the LADO;

The Head Teacher will always seek advice from the LADO where they are in any doubt whatsoever.

While responding to any incident, the Head Teacher will make appropriate notes of:

- all internal conversations – including with the person who initially shared the low level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
- all external conversations – for example, with the LADO / SCIE Officer (where they have been contacted);
- the action taken and the rationale for the decision taken.

Possible outcomes from a low-level concern

If it is determined that the behaviour is entirely consistent with the school's staff Code of Conduct and the law, the Head Teacher will:

- update the individual in question and inform them of the action taken as above;
- speak to the person who shared the Low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law;
- consider if the situation may indicate that the staff code of conduct or low-level concerns policy are not clear enough, or if further training is required.
-

If the same or a similar Low-level concern is subsequently shared about the same individual, and the behaviour in question is also consistent with the staff Code of Conduct, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived by others

If it is determined that the behaviour constitutes a Low-level concern, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings.

Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

Most Low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training.

In many cases, a Low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening.

Any such conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.

Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;

Some Low-level concerns may also raise issues of misconduct or poor performance. The Head Teacher will also consider whether this is the case – by referring to the organisation's conduct and/or capability procedure and taking advice from GCC's HR service (if necessary) – a named or no-names basis where necessary. Where a Low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR.

Where a Low-level concern relates to a person employed by a supply agency or a contractor, that concern will be raised with their employers, so that any potential patterns of inappropriate behaviour can be identified. How an organisation responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee, or worker to whom the organisation's disciplinary procedure would apply; or a contractor, Governor, Trustee, or volunteer who may be subject to alternative procedures.

Some concerns may trigger the school's conduct, capability, grievance or whistleblowing procedures, which should be followed where appropriate. Where Low level concerns are raised which in fact require other internal processes to be followed, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. The Head Teacher will exercise their professional judgement and, if in any doubt, they will seek advice from other external agencies including the LADO or Safeguarding Team.

If Uley Primary School's disciplinary procedure is triggered, the school will ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them.

If an organisation ultimately disciplines or dismisses a staff member for cumulative alleged 'breaches' of the staff Code of Conduct which were not brought contemporaneously to the individual's attention, and to which they have not had a proper opportunity to respond, clearly there will be a lack of fairness and natural justice and the risk of a finding of unfair dismissal by an Employment Tribunal. Staff therefore need to understand that when they share what they believe to be a Low level concern, the Head Teacher will speak to the adult who is the subject of that concern – no matter how 'Low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

If it is determined that the behaviour, whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, then action (if/as necessary) will be taken in accordance with the LADO's advice.

If, when considered with any other Low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, then it should be referred to the LADO in accordance with Part Four of Keeping Children Safe in Education 2026.

Storage of low-level concerns

Uley Primary School will retain all records of low-level concerns (including those which are subsequently deemed by the Head Teacher to relate to behaviour which is entirely consistent with the staff Code of Conduct) in a central low-level concerns file. These records will be kept confidential and held securely with limited access given to the Head Teacher and the School Administrator.

Where multiple Low-level concerns have been shared regarding the same individual, these will be kept in chronological order as a running record.

Low-level concerns will not be stored on personnel files. Saving Low-level concerns separately will allow Leaders to spot any potential patterns of behaviour whilst reassuring staff to share low level concerns.

Referrals made to the LADO where the behaviour in question:

- had not originally been considered serious enough to consider a referral to the LADO but merited consulting with and seeking advice from them.

- is determined to meet the threshold of an allegation when considered with any other Low-level concerns that have previously been raised about the same individual; or in and of itself meets the threshold of an allegation.

Records relating to the behaviour (as referenced in 12.4) should be placed and retained on the staff member's personnel file, whilst also being retained on the central low-level concerns file.

Material on the personnel file will be retained in accordance with Part 4 of KCSiE 2026, which requires schools and colleges in England to produce a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept on the confidential personnel file of the staff member, and a copy provided to them

Reviewing the Low-level concerns file

The Head Teacher will review the central low level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made and stored alongside the file, along with any subsequent actions taken.

Governors may receive relevant data relating to low-level concerns and review anonymised samples of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

Retaining Low-level concerns

Low-level concerns will be retained in a central low-level concerns file (securely and applying appropriate access restrictions) until individuals leave the school's employment.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep. This is subject to the rights of individuals to object to or seek to erase or correct records about them under data protection law.

Low-level concerns and references

KCSiE 2026, prohibits schools/ colleges from referring to unsubstantiated, malicious or false allegations in references. Only safeguarding allegations that have been substantiated should be included in references. KCSiE 2026, states that: "where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference".

Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

Spectrum of Behaviour

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that had harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicated they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicated they may not be suitable to work with children

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out 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 may have acted in a way that:

- is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s staff code of conduct, and the law.

Low-level concerns form

You may use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Uley Primary School’s staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s). Please use a separate sheet if necessary. The record should be signed, timed and dated.

Reported by:

Staff member:

Details of the concern:

Multi-Agency Contacts for Safeguarding in Education.

If you have concerns about a child/young person in Gloucestershire:

If a child is at immediate risk call the POLICE	POLICE 999	
To make an URGENT referral to Children's Social Care	i.e., a child is likely to suffer or is suffering significant harm, call:- Gloucestershire MASH 01452 426565 option 3 for Safeguarding Concerns Contact children and family services Gloucestershire County Council Levels of Intervention - levels-of-intervention.pdf	
To make a NON-URGENT referral to Children's Social Care.	Where Early Help/Family Help support is required please Contact children and family services Gloucestershire County Council Professional Advice Line 01452 427070 (Monday to Friday 8.30am to 4.30pm)	
To raise concerns and ask for advice about radicalisation	Gloucestershire Prevent Team - 01452 752604 Refer someone to the Prevent Team Gloucestershire Constabulary Local Authority Prevent Lead educationsafeguarding@gloucestershire.gov.uk	
To liaise with the specialist Safeguarding Police Unit	Home Gloucestershire Constabulary	
Gloucestershire Safeguarding Education Partnership gsep@gloucestershire.gov.uk	Inclusion Advice Line Exclusions: 01452 427360 schoolexclusions@gloucestershire.gov.uk General EIS Helpline 01452 427274 Education Inclusion Service (EIS) [gloucester...ire.gov.uk]	Critical Incident Support EPS Educational Psychology Service (EPS) Gloucestershire County Council

If you have concerns about a professional working with a child:

To raise concerns and ask for guidance in relation to the conduct of someone who works with children.	Local Authority Designated Officer - (LADO) The Role of the LADO & The Allegations Management Process Gloucestershire County Council
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For information, advice, and guidance in relation to safeguarding policy and procedures:

Georgina Summers– gsep@gloucestershire.gov.uk and Helen McCormack– gsep@gloucestershire.gov.uk
 Robbie Foran- educationsafeguarding@gloucestershire.gov.uk and Shelley Bidmead-
educationsafeguarding@gloucestershire.gov.uk

For advice and support in relation to Critical Incidents:

Contact educationsafeguarding@gloucestershire.gov.uk

Child sexual exploitation & child criminal exploitation	Gloucestershire Safeguarding Children Partnership Multi Agency Safeguarding Procedure Manual Gloucestershire Safeguarding Children's Partnership
Child Missing from Education	Children missing education Gloucestershire County Council
Children affected by Forced Marriage	Forced Marriage Unit 020 7008 0151 fm@fco.gov.uk
Online Safety Advice	Professional Online Safeguarding Helpline T: 0344 381 4772 E: helpline@saferinternet.org.uk
Reporting online sexual abuse and grooming	Child Exploitation and Online Protection command https://www.ceop.police.uk/ceop-reporting/
FGM advice	NSPCC FGM Helpline 0800 028 3550 fgmhelp@nspcc.org.uk
Domestic Abuse Helpline	0808 2000 247
Young Carers – advice and support.	Home Gloucestershire Young Carers
CAMHS	https://www.ghc.nhs.uk/our-teams-and-services/children-and-young-people/camhs/
Whistleblowing professional policy	NSPCC Whistleblowing hotline 0800 028 0285 help@nspcc.org.uk
Advice around harmful sexual behaviour.	Gloucestershire Safeguarding Education Partnership – gsep@gloucestershire.gov.uk
	Children's Harmful Sexual Behaviour Gloucestershire Safeguarding Children's Partnership