

# **FEDERATION OF ST ANNE'S AND ST MARTIN'S CATHOLIC PRIMARY SCHOOLS**

## **St Anne's Catholic Primary School**



**Learning to live by faith and to be known by love**

## **CHILD PROTECTION AND SAFEGUARDING POLICY AND PROCEDURES 2025-2026**

## Policy Management

<b>Policy owner</b>	Headteacher
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# I. KEY CONTACTS

## I.1 KEY CONTACTS WITHIN ST ANNE'S

Designated Safeguarding Lead (DSL)	Bridget Tobin
Deputy Designated Safeguarding Leads (DDSLs)	Patricia Lee Claire Corcoran
Safeguarding Governors	Rebecca Mee Anne Pegram Aurlie Dubois

## I.2 KEY CONTACTS WITHIN THE LOCAL AUTHORITY

	Name	Address	Telephone	Email
Children's Single Point of Access	Social Workers including Duty Social Worker	Brighter Futures For Children, Civic Offices, Reading, RG1 2LU	01189373641 Emergency Duty Team 01344786543	<a href="mailto:cspoa@brighterfuturesforchildren.org">cspoa@brighterfuturesforchildren.org</a>
Prevent Officer Thames Valley Police	Prevent Officer	Reading Police Station Castle Street Reading RG1 7TH	07788307178	<a href="mailto:preventreferrals@thamesvalley.pnn.police.uk">preventreferrals@thamesvalley.pnn.police.uk</a>
Community Safety Partnership	Anthony Brain	Reading Borough Council, Civic Officers, Reading, RG1 2LU	01189373179	<a href="mailto:anthonybrain@reading.gov.uk">anthonybrain@reading.gov.uk</a>
Service Manager for Early Help and Prevention	Corinne Dishington	Brighter Futures for Children, Civic Offices, Reading RG1 2LU	01189376012	<a href="mailto:Corinne.dishington@brighterfuturesforchildren.org">Corinne.dishington@brighterfuturesforchildren.org</a>
Education Welfare Service		Brighter Futures for Children, The Avenue Centre, Tilehurst	01189376554	<a href="mailto:ewo@brighterfuturesforchildren.org">ewo@brighterfuturesforchildren.org</a>
Local Authority Designated Officer (LADO)	Sue Derby	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	07841253871 01189373555	<a href="mailto:LADO@brighterfuturesforchildren.org">LADO@brighterfuturesforchildren.org</a>
Virtual School Headteacher	Clare Houlton	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	07803760667 01189373504	<a href="mailto:Clare.houlton@brighterfuturesforchildren.org">Clare.houlton@brighterfuturesforchildren.org</a>
Virtual School Headteacher – Pupil and School Support	Rhiannon Begg	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	01189374147	<a href="mailto:Rhiannon.begg@brighterfuturesforchildren.org">Rhiannon.begg@brighterfuturesforchildren.org</a>
Safeguarding and Children Missing Education Officer (including exclusions)	Fiona Hostler	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	01189374336 07811422419	<a href="mailto:Fiona.hostler@brighterfuturesforchildren.org">Fiona.hostler@brighterfuturesforchildren.org</a>

## 2. CONTEXT OF THE SCHOOL WITH REGARD TO SAFEGUARDING

### 2.1 LOCAL ISSUES

Reading is regarded as a “hotspot” for:

- FGM
- Deaths from heroin and morphine drug use
- County Lines
- Domestic Violence

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff and especially the Designated Safeguarding Lead (DSL) and deputies (DDSLs) should consider whether children are at risk of abuse or exploitation due to situations outside their families.

## 2.2 SCHOOL ISSUES

The school sees a number of safeguarding incidents relating to

- Family separation/ involvement of Children's Services due to domestic violence.
- Diverse community with some families having connections which may place them at some risk of FGM
- Children with a family member affected by drug/alcohol misuse

The school will have due regard to the above issues by:

FGM	See section in this policy Reminder to teachers before and after summer holidays to be alert to holiday destinations, unusual references
Drug and Alcohol Use	See PSHE scheme and Science Curriculum to educate children about lifestyle choices
County Lines	Include in staff meeting safeguarding reminders See PSHE scheme re lifestyle choices
Domestic Violence	DSL/DDSLs to monitor pupils' general well-being and which carers are in the household.
Reading Children's Services	DSL/DDSLs to follow up cases where communication is poor

## 3. AIMS

The aim of this policy is to ensure that the school safeguards and promotes the welfare of children effectively in accordance with the duties arising from Section 175 of the Education Act 2002 and guidance issued by the Department for Education (KCSIE, Sept 2025)

### Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained schools governance guide](#) and [Academy trust governance guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

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
- › 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 have completed safer recruitment training The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › 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 age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

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

## 4. PRINCIPLES OF SAFEGUARDING

Keeping Children Safe in Education 2025 defines safeguarding and promoting the welfare of children as:

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

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

Section 26 of this policy explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section 26 defines neglect in more detail.

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

**Children** includes everyone under the age of 18.

Section 175 of the Education Act 2002 gives schools a statutory duty to promote and safeguard the welfare of children. It is the basic right of every child to feel safe and protected from any situation or practice that may result in a child being harmed through abuse or neglect.

### **Safeguarding and promoting the welfare of children is everyone's responsibility.**

St. Anne's Catholic Primary School is committed to safeguarding and promotes a culture of vigilance working always in the best interests of the child. Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and their staff form part of the wider safeguarding system for children. The school works with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

Information on the roles and responsibilities for all school staff can be found in, '*Keeping children safe in education Information for all school and college staff guidance, July 2025.*'

The school and Federation recognises its legal and ethical duty to promote the wellbeing of pupils, protect them from harm and take appropriate action where there are concerns. Recognising that we have a primary responsibility for the care, welfare and safety of the pupils in our charge, we will carry out this duty through our teaching and learning, extra-curricular provision, pastoral care and extended school activities. In order to achieve this, all staff and volunteers in the school, in whatever capacity, will, at all times, act proactively and promptly in child welfare matters, especially where there is a possibility that a child may be at risk of significant harm. Opportunities to teach children about safeguarding, including on-line safety, will be provided through the delivery of Personal Social Health Education and Relationships Education. We also aim to reduce the potential risks that pupils face of being exposed to violence, extremism, exploitation, discrimination or victimisation.

The school seeks to adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. We hope that parents and children will feel free to talk about any concerns and will see school as a safe place if there are any difficulties.

Children's worries and fears will be taken seriously if they seek help from a member of staff. However, staff cannot guarantee confidentiality if concerns are such that referral must be made to the appropriate agencies in order to safeguard the child's welfare.

At St Anne's, if there are suspicions about a child's physical, sexual or emotional well-being, or that they are being neglected, we will take action.

## 5. KEY PROCESSES

As a consequence, all staff and visitors will:

- Receive appropriate safeguarding and child protection training at induction including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This training will be regularly updated. All staff will:
- Read and understand part I and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Be familiar with this Safeguarding policy
- Know who the DSLs and DDSLs are
- Have been fully inducted before starting in their role, including having read KCSIE 2025, the Behaviour Policy (including cyberbullying, prejudice-based and discriminatory bullying), the Whistleblowing Policy, the Staff Code of Conduct (including low-level concerns/allegations against staff), the Staff Handbook, the school's safeguarding response to children who are absent from education particularly on repeat occasions and/or for prolonged periods and having been informed of the process for dealing with a disclosure from a child.
- Be alert to the signs and indicators of possible abuse.
- Report any concerns regarding a child to the DSL or DDSLs
- Deal with a disclosure of abuse from a child by informing the DSL or a DDSL immediately and provide a written account as soon as possible.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors or volunteers etc
- Be involved, where appropriate, in the implementation of individual Education programmes, Early Help assessments and support plans, Child in Need Plans and inter agency Child Protection plans.

In addition, all governors must be subject to an enhanced DBS check and checked against the Teaching Regulation Agency Barred List (S128 check)

Meanwhile, the school

- Recognises that it could happen here.
- Recognises that abuse, neglect and exploitation are likely to cause significant harm and impact detrimentally on a child's learning, social and emotional well-being, behaviour and attendance.
- Recognises that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges.
- Will ensure that all staff and volunteers are trained to be alert to the possibility that a child is at risk of suffering harm and know how to report concerns or suspicions.
- Will designate a senior member of staff with knowledge and skills in recognising and acting on child protection concerns. S/he will act as a source of expertise and advice and is responsible for coordinating action within the school and liaising with other agencies.
- Ensures (through the DSL) that staff with designated responsibility for child protection receive appropriate training
- Will share any concerns with others who need to know, and assist in any referral process.
- Will ensure that if somebody believes that a child may be suffering, or may be at risk of suffering significant harm, they will always refer such concerns to the DSL/DSLs, who will refer on to Social Services in accordance with the Local Safeguarding Children Board (LSCB)
- Safeguards the welfare of children whilst in the school, through positive measures to address bullying, especially where this is aggravated by sexual or racial factors, or disability or special educational needs.
- Will ensure that all staff are aware of the child protection procedures established by the LSCB and, where appropriate, the LA, and act on any guidance or advice given by them
- Will ensure through recruitment and selection of volunteers and paid employees that all people who work at St. Anne's are suitable to work with children.
- Will act swiftly and make appropriate referrals where an allegation is made that a member of staff has committed an offence against a child, harmed a child, or acted in a way that calls into question their suitability for working with children.

All members of staff (including volunteers and governors), in whatever capacity, will at all times act proactively in child welfare matters. Where any member of staff fails to act in accordance with this policy, this may be dealt with as a disciplinary matter.

## **6. ALLEGATIONS AGAINST STAFF**

Inappropriate behaviour by staff (including supply staff)/governors/volunteers/contractors could take the form of physical, emotional, sexual, neglect or spiritual abuse.

### **6.1 CONCERN OR ALLEGATIONS AGAINST STAFF THAT MAY MEET THE HARM THRESHOLD**

If staff have a safeguarding concern or an allegation is made about another member of staff (including supply staff, volunteers and contractors) harming or posing a risk of harm to children, this:

- Must be referred to the Headteacher.

Where the concern relates to the Headteacher, this should be referred to the Chair of Governors

The Headteacher/Chair of Governors will contact the LADO immediately, seek advice and will act in accordance with the advice. Whilst dealing with the allegation, the school will provide effective protection for the child and support the person subject to the allegation.

This relates to allegations that an individual has:

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

A written record of the complaint, investigation and the LADO's advice will be kept in hard copy in a locked storage drawer. Only the Head and Assistant Head will have access to such records.

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records. However, for all other allegations – i.e. substantiated, unfounded and unsubstantiated – the following information will be kept on the file of the person accused:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved.
- A note of any actions taken and the outcome

The person concerned will receive a copy of the information and a declaration on whether the information will be referred to in any future reference. Records will be retained for 10 years.

### **6.2 LOW-LEVEL CONCERN ABOUT STAFF**

To embed a culture of openness, trust and transparency in which the school's values and behaviour set out in the code of conduct are lived, monitored and reinforced by staff, all low-level concerns about another member of staff (including supply staff, volunteers or contractors) should be reported to the Headteacher immediately. A low-level concern is any concern 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 work and
- Does not meet the harm threshold or otherwise is not serious enough to consider a referral to the LADO

Examples include:

- Being over-friendly with children
- Having favourites
- Taking photos on a personal mobile phone contrary to school policy
- Engaging with a child 1:1 in a secluded area
- Humiliating children

The Headteacher will:

- Address any unprofessional behaviour and support staff to correct this.
- Handle and respond to concerns sensitively and proportionately.
- Identify any weaknesses in the school's safeguarding systems.
- Seek the advice of the LADO if there is any doubt as to whether the harm threshold is met
- Record all low-level concerns in writing. This record will include:
  - o Details of the concern
  - o The context in which the concern arose
  - o Action taken
  - o Name of the individual sharing the concern
- Store the concern in hard copy in a locked drawer to which only the Headteacher and Assistant Headteacher have access.

## **7. CONCERN OR ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD RELATING TO ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES**

Should the school receive an allegation relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children e.g. holiday camp, extra-curricular activities, drama group, the school will follow the procedure outlined in 6.1 above.

## 8. DESIGNATED SAFEGUARDING LEAD (DSL)

The Designated Safeguarding Lead for child protection at St. Anne's Catholic Primary School is **Brigid Tobin**.

The Deputy Designated Safeguarding leads are **Patricia Lee, Chloe Jenkins and Claire Corcoran**.

The DSL takes lead responsibility for safeguarding and child protection. During term-time, the DSL and/or a DDSL should always be available during school hours for staff to discuss any safeguarding concerns.

The DSL must ensure, working alongside governors, that this policy is reviewed annually and that safeguarding procedures are updated in line with guidance and are reviewed regularly. In addition, other broad areas of responsibility for the DSL are as follows.

### 8.1 MANAGING REFERRALS

The DSL must

- Where a child is suffering or is likely to suffer from harm, make a referral to LA children's social care and/or if appropriate to the police immediately.
- follow up with social care if information is not forthcoming.
- If social workers decide to carry out a statutory assessment, do everything they can to support that assessment.
- Consider following local escalation procedures to ensure their concerns have been addressed and the child's situation improves If, after an assessment, a child does not appear to be improving.
- In the case of an early help assessment, liaise with other agencies as appropriate acting as lead practitioner where necessary.
- Refer all children protection concerns which concern a staff member to the Local Authority Designated Officer (LADO)
- Refer to the Disclosure and Barring Service all cases where a person is dismissed or leaves due to risk/harm to a child.
- Refer to the police, cases where a crime may have been committed
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Ensure that detailed, accurate and secure records of concerns and referrals are kept. Records should include:
  - o A clear summary of the concern
  - o Details of how the concern was followed up and resolved.
  - o A note of any actions taken, decisions reached and the outcome\*. This should also include a clear and detailed rationale for when a referral to an outside agency has not been made.

\*At St Anne's historical records to January 2021 are kept on paper in a locked filing cabinet. Thereafter, all records are on CPOMS.

- Ensure that safeguarding records are transferred - by hand (in the case of paper records) or by secure mail for CPOMS - to receiving schools where pupils move/transition. These records must be sent separately from the main pupil file and go straight to the receiving DSL.
- Where possible, ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- Ensure that there are systems in place for children to express their views and give feedback.

### 8.2 TRAINING

The DSL and DDSLs will receive appropriate training to provide them with the knowledge and skills required to carry out the role. This training should be updated every two years. In addition to their formal training, knowledge and skills should be updated (for example via termly LA updates, e-bulletins, meeting other designated safeguarding leads and taking time to read and digest safeguarding developments) at regular intervals (but at least annually).

Additionally, the DSL should:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct child protection case conferences and child protection review conferences.
- Ensure all staff have appropriate safeguarding training so that they can identify possible signs of abuse, exploitation or neglect.
- Ensure every member of staff has access to and understands this policy and procedures, especially new and part time staff
- Ensure that all staff have read: *Keeping children safe in education Information for all school and college staff guidance, July 2025* and the school's Staff Code of Conduct
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Encourage amongst all staff a culture of listening to children and taking account of their wishes and feelings and ensuring staff support any measures the school may put in place to protect children

### 8.3 RAISING AWARENESS

The DSL should ensure that this policy is available on the school website and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.

#### **8.4 THE HEADTEACHER**

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

- › Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems that 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 and via the school website
- › Ensuring that there is 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.
- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DDSL on this.
- › Ensuring the relevant staffing ratios are met, where applicable
- › Overseeing the safe use of technology, mobile phones and cameras in the setting.
- ›

### **9. DESIGNATED GOVERNOR/S**

The Designated Governors for Child Protection at St. Anne's Catholic Primary School are Rebecca Mee and Aurelie Dubois.

Governors will ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly under inter-agency procedures.

The Governing Body will

- ensure that the Designated members of staff for child protection are given sufficient time to carry out their duties, including accessing training.
- review child protection practices in the schools on a regular basis, and no less than termly, to ensure that there are appropriate policies and procedures in place so that appropriate action can be taken in a timely manner to safeguard and promote children's welfare.
- have read Part 1 and Part 2 of "**KCSIE-25**"
- ensure that the school operates "safer recruitment" procedures and that appropriate checks are carried out on all new staff and volunteers.
- Make sure at least one senior member of the school's leadership team acts as DSL, and at least one DDSL is appointed.
- Make sure that:
  - the Headteacher and all other staff who work with children undertake safeguarding training on an annual basis with additional updates as necessary within a 2-year framework and that a training record is maintained.
  - temporary staff and volunteers are made aware of the school's arrangements for safeguarding and child protection and their responsibilities.
  - the school remedies any deficiencies or weaknesses brought to its attention without delay.
  - the school has procedures for dealing with allegations of abuse against staff/volunteers.
  - disciplinary action is taken against staff/volunteers where allegations are substantiated.
  - the school complies with the statutory guidance concerning FGM.

The nominated safeguarding governor/s will complete safeguarding training at Level 1. Any governors involved in recruitment are trained in "Safer Recruitment." All governors will undertake safeguarding training at Level 1 and Prevent Training.

### **10. LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN**

The designated senior member of staff (Designated Lead) for looked after children in this school is **Chloe Jenkins**. Information will be kept on:

- The child's looked after legal status
- Contact arrangements with those with parental responsibility.
- The child's care arrangements and levels of authority delegated by the authority.
- Details of the child's social worker
- The name of the virtual head in the authority who looks after the child.
- The designated person for looked after children will work with the virtual school head to ensure that pupil premium plus additional funding is best used to support looked after children in school.

## **II. SAFER RECRUITMENT**

In order to ensure that children are protected whilst at this school, we will ensure that our staff and volunteers are carefully selected, screened, trained and supervised. In order to achieve this, we will follow the guidance set out in “*Safeguarding Children and Safer Recruitment in Education*” 2011 (updated 2012) and “*Keeping children safe in education*” **July 2025**.

The staff member trained in Safer Recruitment is Bridget Tobin and Patricia Lee

### **II.1 RECRUITMENT PROCESS**

#### **II.1.1 Advert**

The school will include the following information in any advertisement.

- The skills, abilities, experience, attitude and behaviours needed for the post.
- The safeguarding requirements as per the job description and person specification
- The school's commitment to safeguarding and promoting the welfare of children.

#### **II.1.2 Application Forms**

Where available, we will use the CES application forms requiring applicants to provide:

- Personal details, current and former names, current address and national insurance number
- Details of their present/last employment and reason for leaving
- Full employment history including reasons for any gaps in employment.
- Qualifications, the awarding body and date of award
- Details of referees/references
- A statement of personal qualities and experiences that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

#### **II.1.3 Shortlisting**

Shortlisting should be carried out by at least 2 people and should consider any inconsistencies e.g. gaps in employment and explore all potential concerns. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

#### **II.1.4 History and references**

The school should obtain references prior to interview allowing any concerns to be explored with the referee and taken up with the candidate at interview. The school will

- Not accept open references e.g. to whom it may concern.
- Ensure references are from the current employer and are completed by a senior person and are confirmed by the headteacher as accurate in regard to disciplinary investigations.
- Always verify any information with the person who provided the reference.
- Ensure electronic references originate from a legitimate source.
- Contact referees to clarify content where information is vague or insufficient information is provided.
- Establish the reason for the candidate leaving their current or most recent post.

#### **II.1.5 Selection**

We will use a range of selection techniques to identify the most suitable person for the post. Any potential areas of concern will be explored including:

- Any implication that adults and children are equal.
- A lack of recognition and/or understanding of the vulnerability of children
- Inappropriate idealisation of children
- Inadequate understanding of appropriate boundaries between adults and children
- Indicators of negative safeguarding behaviours.

#### **II.1.6 Pre-appointment vetting checks, regulated activity and recording information.**

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks including:

- Verifying a candidate's identity
- Obtaining an enhanced DBS check
- Obtaining a children's barred list check
- Verifying a candidate's mental and physical fitness to carry out their work
- Verifying the person's right to work in the UK
- Making further checks as appropriate if the person has lived/worked outside the UK.
- Verifying professional qualifications as appropriate
- Ensuring that a candidate for a teaching position is not subject to a prohibition order.
- Undertaking an online presence search

The single central record must indicate whether the following checks have been carried out/certificates obtained and the date on which the check was completed.

- An identity check
- A barred list check
- An enhanced DBS check

- A prohibition from teaching check
- Further checks on people who have lived or worked outside the UK.
- A check of professional qualifications where required.
- A check to establish the person's right to work in the UK.

## **12. SUPPLY TEACHERS**

Supply agencies must give written notification of enhanced DBS checks for staff used by the school. Supply teachers not from an agency must obtain an enhanced DBS which must be recorded on the school's Single Central Register (SCR). Where the position requires a Children's Barred List Check, this must be obtained by the agency. The school should check that the person presenting themselves for work is the same person on whom the checks have been made.

If staff have safeguarding concerns about a supply teacher, or an allegation is made about another member of staff (including supply staff) posing a risk of harm to children, this should be referred to the Headteacher (see section 6 above).

## **13. CONTRACTORS**

Where the Governing Bodies contracts its services to outside providers, it will ensure that these providers have appropriate safeguarding and child protection policies and procedures, and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider.

If a contractor is self-employed then the school will obtain a DBS check.

In the case of visiting contractors, the school will check the identity of contractors on arrival at the school and ensure that any contractor or employee of the contractor who is to work at the school has been subject to the appropriate level of DBS check. Where a contractor does not have a DBS, s/he must not be permitted to work unsupervised at any time on school premises.

## **14. VOLUNTEERS**

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, will be given the same consideration as paid staff. Where a parent or other volunteer helps on a one-off basis, he/she will work only under the direct supervision of a member of staff and will at no time have one to one contact with children. However, if a parent or other volunteer is to be in school regularly or frequently, we will treat them as if they were paid employees and complete an enhanced DBS check to ensure their suitability to work with children as well as collecting two references.

Volunteers will be given information on the school safeguarding procedures as a part of the induction process. If staff have safeguarding concerns about a volunteer, or an allegation is made about a volunteer posing a risk of harm to children, then this should be referred to the Headteacher (see section 6 above).

## **15. WORK EXPERIENCE**

Children under the age of 16 on work experience will not be expected to provide an enhanced DBS check. An enhanced DBS check may, however, be requested for young people on work experience over the age of 16 depending on how long or how regular the placement is. This decision will be taken by the DSL. Any person in school on work experience without a DBS must be fully risk assessed and should not be left alone with children at any time.

## **16. STUDENTS**

Students on placement must have an enhanced DBS check.

## **17. VISITORS**

Schools have many different types of visitors. For visitors such as children's relatives, no DBS checks should be requested. The DSL/DDSLs should use their professional judgment about the need to escort or supervise such visitors. For visitors who are in school in a professional capacity, ID and DBS should be checked.

## **18. THE USE OF REASONABLE FORCE**

There are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable', in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. The school will not have a 'no

contact' policy as this could lead our staff to be unable to fully support and protect pupils. See the school's Positive Handling Policy.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities, mental health or with medical conditions, staff should consider the risks carefully, making reasonable adjustments and following the principles of the school's Positive Handling Policy and Behaviour Policy.

## 19. OUR ROLE IN THE PREVENTION OF ABUSE

As well as ensuring that we address child protection concerns, we will also ensure that children who attend the school are kept safe from harm whilst they are in our charge.

To this end, this policy must be seen in light of the school's policies/documents on:

- Attendance (including when children go missing)
- Behaviour
- Bullying - the school will ensure that any bullying is identified and dealt with so that harm caused by other pupils can be minimised.
- Code of conduct for staff
- Confidentiality
- Equal opportunities, Special Educational Needs and Disabilities
- Online Safety
- Health & Safety
- Intimate care
- Lone Working
- Medical Conditions
- Safer recruitment
- Sex and Relationships Education and the PSHE curriculum - child protection issues will be addressed through the curriculum as appropriate
- Positive Handling
- Whistleblowing
- Early years foundation stage (EYFS) statutory framework

## 20. ONLINE SAFETY

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

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors. ( See Appendix 1)
- › 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

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

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

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

- › Educate 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're a witness rather than a victim.
- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and 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, cameras, and other electronic devices with imaging and sharing capabilities. For example that:
  - Staff are allowed to bring their personal phones and electronic devices with imaging and sharing capabilities (for example a Smart Watch or Apple Watch) to school for their own use, but will limit such use to non-contact time when pupils are not present. All Smart Watches should be switched to airplane mode during contact time with pupils.
  - Staff should not take pictures or recordings of pupils on their personal phones or camera or any electronic device with imaging and sharing capabilities.
- › 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.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy which can be found on our website.

## 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.

St Anne's 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.

St Anne's will treat any use of AI to access harmful content or bully pupils in line with this policy and our [anti-bullying/behaviour/artificial intelligence] policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

## 21. PHOTOGRAPHING CHILDREN

We understand that parents like to video and/or take photos of their children in school events. This is a normal part of family life, and we will not discourage parents from celebrating their child's successes. We do, however, request before every event that parents do not photograph/film children other than their own and that they do not upload images/films to social media. We will not allow photographs or filming of pupils during a school activity without the parents' permission. In addition, we will not allow images of pupils to be used on school websites, publicity, or press releases, without written permission from the parent, and if we do obtain such permission, we will not identify individual children by name unless written permission is given by parents or carers.

If there are Health and Safety issues associated with filming/photographing e.g. the use of a flash when taking photos could distract or dazzle the child and cause them to have an accident, we will encourage parents to use film or settings on their camera that do not require flash.

## 22. CONFIDENTIALITY

The school and all members of staff at the school, will ensure that any and all data about pupils is handled in accordance with the requirements of the law and any national and local guidance.

Any member of staff who has access to sensitive information about a child or a child's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know. All child protection records will be kept separately from the child's main file and the DSL will restrict access to those people who have a role to play in protecting the child.

Staff should never promise a child that they will not tell anyone about an allegation, as this ultimately may not be in the best interest of the child. However, all staff should be able to reassure victims they are being taken seriously and will be supported and kept safe.

## 23. INFORMATION SHARING

Whilst GDPR places duties on organisations to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

When children transfer to another school, the DSL will ensure that the relevant child protection file is transferred to the new school as soon as possible. This will be delivered electronically where possible. Confirmation of receipt must be obtained. If appropriate, the Assistant Head (Pastoral)/DSL may share information with a new school in advance of a child leaving so that the appropriate support can be put in place.

As a receiving school, the admin officer will notify the Assistant Head (Pastoral)/ DSL on arrival of a CP file.

## 24. CONDUCT OF STAFF

The school has a duty to ensure that professional behaviour applies to relationships between staff and children and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries (see Staff Code of Conduct). At all times, members of staff are required to work in a professional way with children. All staff should be aware of the dangers inherent in:

- Working alone with a child
- Physical intervention
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving and receiving gifts to/from children and parents
- Disclosing personal details inappropriately
- Meeting pupils outside school hours or school duties
- Contacting children through private telephones, including texting, email, MSN or social networking sites

If any member of staff has reasonable suspicion that a child is suffering harm and fails to act in accordance with this policy and the LSCB procedures, we will view this as misconduct and take appropriate action.

All members of staff must understand that allegations that they have assaulted a child, or placed a child at risk of harm, will be investigated in a multi-agency way involving the Police and Social Services. Where any member of the staff believes that the Headteacher/DP is failing to act in accordance with this policy they should bring it to the attention of the Chair or Governors as a matter of urgency (see section 6 of this policy).

## 25. WHAT WE WILL DO WHEN WE ARE CONCERNED - EARLY HELP RESPONSE

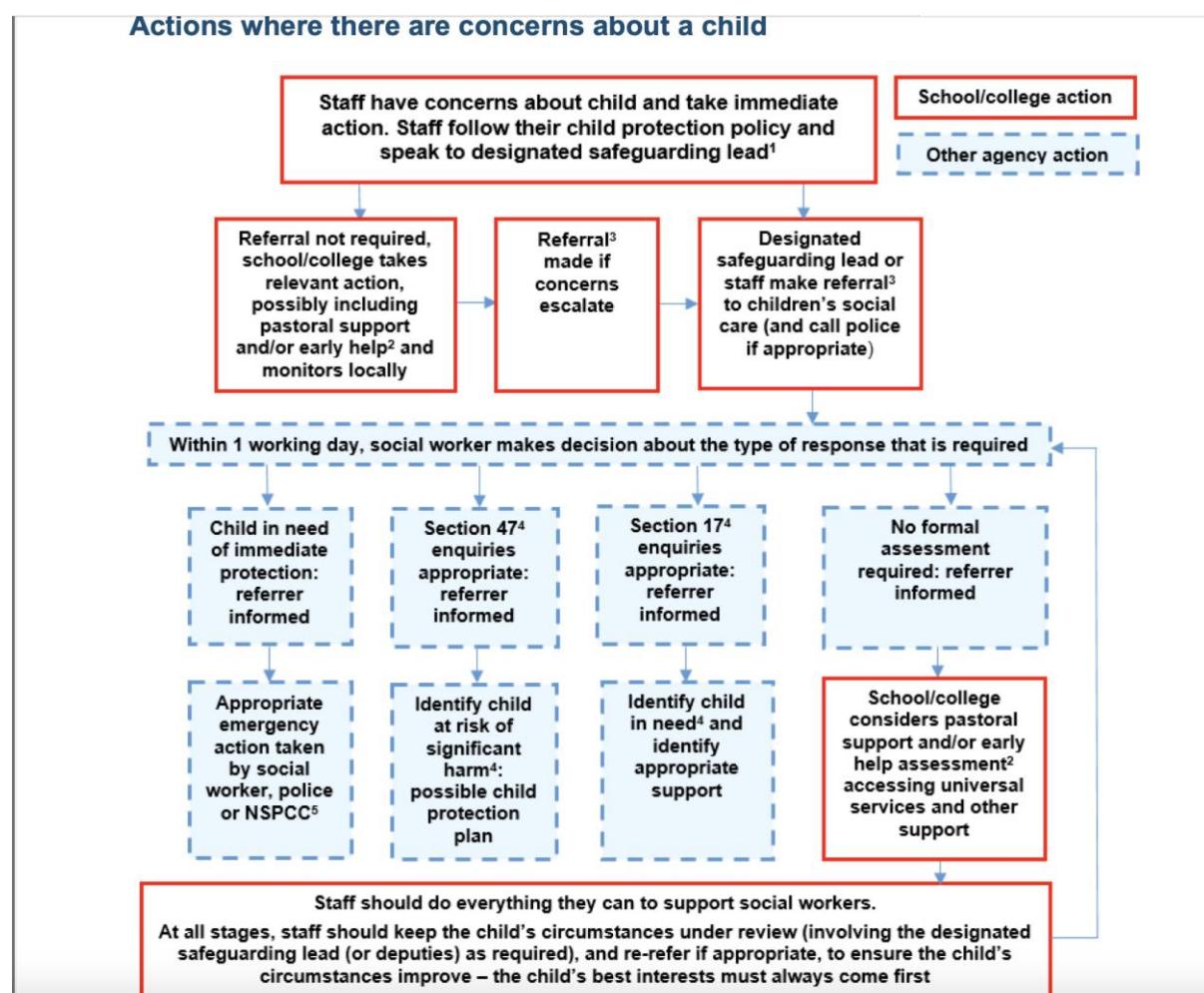
All staff should be prepared to identify children who may benefit from early help. This means providing support as a problem emerges at any point in a child's life.

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

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and 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.



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

All staff should be aware of the local early help process and understand their role in it. Members of staff and volunteers must not investigate suspicions. If somebody has reason to consider that a child may be suffering/be at risk of suffering significant harm, observes injuries that appear to be non-accidental, is present when a child makes a direct allegation/implies they have been abused or is present when a child makes an

allegation against a member of staff, that adult must always discuss such concerns with the DSL. S/he must record on CPOMS for staff/in writing for volunteers what they have seen, heard or know accurately as soon as possible after the disclosure/event and must share their concerns with the DSL/DDSLs.

The DSL/DDSLs will consider the threshold guidance and any early help services that are available. They may take advice from the Access and Assessment team at RBC and make a referral to Children's Services as required.

Clear records of contact with persons giving advise should be maintained on CPOMs. This may include a record of why a formal referral was not made.

## **26. SPECIFIC FORMS OF ABUSE AND SAFEGUARDING ISSUES**

All the following forms of abuse/safeguarding issues will be covered in safeguarding training.

### **26.1 ABUSE AND NEGLECT**

All staff should be aware of indicators of abuse and neglect. All staff and especially the DSLs should consider whether children are at risk of abuse/exploitation in situations outside their families. Children can be vulnerable to sexual harms (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Staff should be aware that abuse, neglect and safeguarding issues are rarely stand alone events and, in most cases, multiple issues overlap. Therefore, staff should always be vigilant and raise any concerns with the DSL/DDSLs.

They should also be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases, abuse will take place concurrently via online channels and in daily life. Children also abuse other children. This can take the form of abusive, harassing and misogynist/misandrist messages, the non-consensual sharing of indecent images especially around chat groups and the sharing of abusive images and pornography to those who do not want to receive such content.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

### **26.2 ABUSE**

Abuse is defined as a form of maltreatment of a child. Somebody may abuse/neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can take place wholly online or technology may be used to facilitate offline abuse. Children may be abused by an adult/adults or by another child/children.

Harm can include witnessing the ill treatment of others (e.g. in relation to the impact on children of domestic abuse).

#### **26.2.1 Physical Abuse**

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning/scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may be caused in the context of Fabricated Induced Illness (FII).

#### **26.2.2 Emotional Abuse**

Emotional abuse is 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 they are worthless/unloved, inadequate or valued in so far as they meet the needs of another person
- Not giving a child opportunities to express their views, silencing them or making fun of what they say or how they communicate
- Age inappropriate expectations including interactions exceeding a child's development capabilities or overprotection and limitation preventing a child from participating in normal social interaction
- Seeing/hearing ill treatment of another
- Serious bullying causing a child to feel frightened (including cyberbullying)
- Exploitation/corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child although it may occur alone.

#### **26.2.3 Sexual Abuse**

Sexual abuse involves forcing/enticing a child or young person to take part in sexual activities whether or not the child is aware of what is happening. Activities may involve physical contact including:

- Assault by penetration e.g. rape/oral sex
- Non-penetrative acts e.g. masturbation, kissing, rubbing, touching outside of clothing

It can include non-contact activities e.g.

- Involving children looking at or in the production of sexual images
- Watching sexual activities
- Encouraging children to behave in sexually inappropriate ways
- Grooming a child in preparation for abuse

Sexual abuse can take place online and technology can be used to facilitate offline abuse. Men and women may commit sexual abuse as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

#### **26.2.4 Sharing of nudes and semi-nudes ('sexting')**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or 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.
- › 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 SEND)
- › 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 headteacher 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 by dialling 101].

### **Recording incidents**

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

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE and RSE curriculum. Specifically:

- › 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 policy 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

## **26.3 NEGLECT**

Neglect is defined as 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.

It can occur in pregnancy e.g. as a result of maternal substance abuse.

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

- Provide adequate food, clothing and shelter (including exclusion from home/abandonment)
- Protect a child from physical/emotional harm/danger
- Ensure adequate supervision
- Ensure access to appropriate medical care
- Respond to a child's basic emotional needs

## **26.4 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.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. St Martin's School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology or to far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights movements.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are

often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the police or the Channel programme through the school's DSL.

#### **26.4.1 PREVENT**

All schools 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 involved with or supporting terrorism". This duty is known as the Prevent duty.

The school will approach the Prevent duty on three levels:

- Be able to identify members of the school community who are vulnerable to and are at risk of being 'radicalised' and show signs of this.
- Know how to respond when children or young people show indications that they are vulnerable to risk
- Ensure that the components of British Values are addressed implicitly and explicitly throughout the curriculum and other aspects of provision.

The Prevent Duty has three general themes:

- Risk Assessment: This relates to the context of the school's geographical area. Within the context of England, Reading is considered a tier 3 priority area with tier 1 being the highest threat level and tier 3 the lowest. The school will request relevant information from the Prevent lead in the local authority to understand the risks faced by pupils in this area.
- Working in Partnership - Policies will take into account the policies and procedures of the Local Safeguarding Children Boards (LSCBs).
- Training - The DSL will access Prevent training. All new staff will be expected to do this training as part of their induction. Prevent training by staff will be redone every year.

#### **26.5 FEMALE GENITAL MUTILATION**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

*Section 5B of the FGM Act 2003* places a statutory duty on teachers to report to the police where they discover (through disclosure/visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence and they should not be examining students. However, professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Teachers must personally report to the police cases whereby they discover an act of FGM appears to have been carried out and, unless the teacher has good reason not to, should consider and discuss any case with the DSL and involve social care as appropriate. This duty does not pertain to at risk/suspected cases or cases where the victim is 18+/.

#### **26.6 FORCED MARRIAGE**

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats (physical, emotional or psychological) or any other form of coercion is used to cause a person to enter into a marriage. Forcing a person into a marriage is a crime in England and Wales. Staff should be alert to this happening in primary school as well as to older siblings.

Staff should speak with the DSL.

#### **26.7 HONOUR-BASED VIOLENCE**

Honour based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/ or the community including FGM, forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

Staff should be alert to this happening in primary school as well as to older siblings. Staff in school need to be alert to the possibility of a child being at risk of, or having already suffered, HBV.

#### **26.8 SERIOUS VIOLENCE**

All staff should be 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/relationships with older individuals/groups
- A significant decline in performance
- Signs of self-harm, a significant change in wellbeing, signs of assault or unexplained injuries

- Unexplained gifts/new possessions could 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.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence including

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment and having been involved in offending e.g. theft/robbery

## **26.9 CHILD SEXUAL EXPLOITATION (CSE) and CHILD CRIMINAL EXPLOITATION (CCE)**

Both CSE and CCE are forms of abuse and occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. Whilst age may be the most obvious imbalance, this power inequality can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation (as well as being physical) can be facilitated and/or take place online.

### **26.9.1 Child Sexual Exploitation (CSE)**

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. It may involve physical contact including assault by penetration (e.g. rape or oral sex) or non-penetrative acts (e.g. masturbation, kissing, rubbing and touching outside clothing). It may also involve non-contact activities (e.g. involving children in the production of sexual images, forcing children to look at sexual images/watch sexual activities, encouraging children to behave in a sexually inappropriate way or grooming a child).

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Some of the following signs may be indicators of sexual exploitation:

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

CSE can happen to primary school children and may occur over time or be a one-off occurrence. It may happen without the child's immediate knowledge e.g. sharing videos on social media. Staff members should report any suspicions of CSE to the school's DSL.

### **26.9.2 Child Criminal Exploitation (CCE)**

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. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

'County lines' is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties and they use dedicated mobile phone 'lines' to supply drugs.

Signs of criminal exploitation and county lines include

- Returning home late, staying out all night or going missing
- Being found in areas away from home
- Increasing drug use, or being found to have large amounts of drugs on them

- Being secretive about who they are talking to and where they are going
- Unexplained absences from school, college, training or work
- Unexplained money, phone(s), clothes or jewellery
- Increasingly disruptive or aggressive behaviour
- Using sexual, drug-related or violent language they wouldn't be expected to know
- Coming home with injuries or looking particularly disheveled
- Having hotel cards or keys to unknown places.

CCE can happen to primary school children. Girls' experiences of CCE can be very different to boys' and indicators may also be different.

## 26.10 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 DSL before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#).

## 26.11 CHILD ABUSE LINKED TO FAITH OR BELIEF

*The National Action Plan to Tackle Child Abuse linked to Faith or Belief (2012)* stated that such abuse included belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

The approach to tackling this kind of abuse must be focused on keeping the child safe. Staff should refer any concerns of this nature to the DSL.

## 26.12 FABRICATED INDUCED ILLNESS

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. In fabricated or induced illness, the parent may present the child as ill when they are healthy, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms.

### 26.12.1 Indicators of fabricated or induced illness

Some of the indicators of fabricated or induced illness, include:

- A medical history that does not make sense
- Treatment is ineffective
- Symptoms that disappear when the carer is not around
- Children seen repeatedly by different professionals looking for different things

In all cases, the child's normal life is restricted. Where fabricated and induced illness is suspected, staff should report to the DSL immediately.

## 26.13 UPSKIRTING

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence.

## **26.14 CHILD ON CHILD ABUSE - ALLEGATIONS OF ABUSE MADE AGAINST OTHER CHILDREN**

Staff should recognise that children are capable of abusing other children inside/outside school and online/offline.

**Abuse is abuse and will not be tolerated at St Anne's.**

Staff should understand the importance of challenging inappropriate behaviour between children including

- bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships (sometimes known as teenage relationship abuse)
- Physical abuse including hitting, kicking, shaking, biting, hair pulling etc. This may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence including rape, assault by penetration and sexual assault. This may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment including sexual comments, remarks and jokes (including online)
- Causing someone to engage in sexual activity without consent e.g. forcing someone to strip/touch themselves sexually or to engage in sex with a third party
- Consensual and non-consensual sharing of nude and semi-nude images or videos (sexting/youth produced sexual imagery)
- Upskirting (typically involving taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttock to obtain gratification or to cause the victim humiliation, distress or alarm)
- Initiation/hazing type violence and rituals (including activities involving abuse/harassment/humiliation as a way of initiating a person into a group)

## **26.15 CHILD TRAFFICKING**

Child trafficking is child abuse. It is defined as recruiting, moving, receiving and harbouring children for the purpose of exploitation and is a form of modern slavery. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.

Children are trafficked for:

- Child sexual exploitation
- Criminal activity, including:
  - o cannabis cultivation
  - o street crime - such as pickpocketing, begging and bag theft
  - o moving drugs
  - o benefit fraud
  - o immigration fraud
  - o selling pirated goods, such as DVDs
- forced marriage
- domestic servitude, including
  - o cleaning
  - o childcare
  - o cooking
- forced labour, including working in restaurants, nail bars and factories
- agriculture
- illegal adoption
- unreported private fostering arrangements (for any exploitative purpose).

### **26.15.1 Indicators**

Children who are trafficked are intentionally hidden and isolated from the services and communities who can identify and protect them. While identification may be difficult, there are signs. Children who have been trafficked or are at risk of being trafficked may:

- spend a lot of time doing household chores
- rarely leave their house, have no freedom of movement and no time for playing
- be orphaned or live apart from their family, often in unregulated private foster care
- live in substandard accommodation
- not be sure which country, city or town they are in
- be unable or reluctant to give details of accommodation or personal details
- not be registered with a school or a GP practice
- not have any documents (or have falsified documents)
- not have access to their parents or guardians
- be seen in inappropriate places - such as brothels or factories
- possess money or goods they cannot account for
- be permanently deprived of a large part of their earnings, for example they may be required to earn a minimum amount of money every day or pay off an exorbitant debt
- have injuries from workplace accidents
- give a prepared story which is very similar to stories given by other children

Signs an adult may be trafficking a child include:

- making multiple visa applications for different children

- acting as a guarantor for multiple visa applications for children
- travelling with different children who they are not related to or responsible for
- Insisting on remaining with and speaking for a child
- living with unrelated or newly arrived children
- abandoning a child or claiming not to know a child they were previously with

### **26.15.2 Responding**

Child trafficking is child abuse. It requires a child protection, multi-agency response in line with current legislation.

### **26.16 CHILDREN WHO GO MISSING FROM EDUCATION**

A child going missing from education is a potential indicator of abuse or neglect. School staff should follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual exploitation and to help prevent a child going missing in future. St Anne's – with the support of the ASW (Attendance Support Worker) - monitors attendance and addresses it when it is poor or irregular. We notify the LA of any pupil that fails to attend regularly.

The school informs the local authority of any pupil who is going to be deleted from the admission register where they:

- Have been taken out of school by their parents and are being educated outside the school system e.g. home education (the school will obtain written confirmation/ information from the parents)
- Have ceased to attend school and no longer live within reasonable distance of the school at which they are registered
- Have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period
- Have been permanently excluded

Notification will be made to the local authority as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

At St Anne's notification is done through the Educational Welfare Service. Before deletion the school will notify the ASW of any children vulnerable to going missing. If children move schools and the school is notified through a third party, then the ASW will also be informed. The school will endeavour to follow up any such moves through the admissions team at the appropriate authority.

The school is required to notify the LA within 5 days when a pupil's name is added to the admissions register (other than when pupils are registered at the start of Reception year).

## **27. INVOLVING PARENTS/CARERS**

The school values the engagement of parents and where safeguarding issues arise, responses by the school will involve consultation with parents unless children are felt to be at risk of serious harm.

## **28. MULTI-AGENCY WORK**

As part of its preventative work, the school will secure the support of a range of agencies through the Early Help Hub. In our role of supporting children, we work with a range of professionals including educational psychologists, speech therapists, occupational therapists, family workers, social workers, and teachers from the sensory consortium.

## **29. CHILDREN WITH ADDITIONAL NEEDS**

St Anne's recognises that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation 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. This includes:

ELSA sessions and interventions as appropriate to assist with communication.

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

## **30. CHILDREN IN SPECIFIC CIRCUMSTANCES - PRIVATE FOSTERING**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or 'a close relative'. This is a private arrangement made between a parent and a carer for 28 days or more. There is a mandatory duty to inform the local authority of child in such arrangements. If an arrangement is discovered, staff must report to the DSL who will:

- Ask parents and/ or foster carers if they have notified Children's Services of the private fostering arrangements
- Inform the private foster carers and the child's parents of their legal responsibilities and encourage them to contact Children's Services

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness;
- Children whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children;
- Teenagers who stay with friends (and other non-relatives) because they have fallen out with their parents;
- Children staying with families while attending a school away from their home area.

## **31. FAMILIES WITH MULTIPLE NEEDS**

Ofsted noted in the *Key Findings of Learning Lessons from Serious Case Reviews 2009-2010* (page 5) that:  
'The most common issues [relating to the children's families] were domestic violence, mental ill-health and drug or alcohol misuse. Frequently, more than one of these characteristics were present.'

These issues rarely exist in isolation. In fact, there is often a complex interaction between two or three of the different concerns and families are said to have 'multiple needs'. Children and young people living within households with domestic violence, parental mental ill-health or parental substance misuse can be affected across many key areas of their development including health, education and emotional and behavioural development. Safeguarding children and young people living in families with multiple needs is a priority. Multi-agency working is vital in such situations and the school is committed to working with other professionals.

## **32. MONITORING AND EVALUATION OF SAFEGUARDING**

Implementation and day to day working of this policy will be monitored by the DSL, who will liaise with the Governors and bring to their attention any concerns that the policy is not being adhered to or any changes required arising from changes to statutory guidance or LSCB procedures.

The DSL will report to the Governing Body three times annually (minimum) on the number of children on CP and CIN Plans. Safeguarding governors will meet with the DSL and/or DDSL at least twice yearly to audit safeguarding processes. The Head Teacher will also report to the Governing Body on:

- Bullying incidents
- Racist Incidents
- Complaints and compliments
- Allegations against members of staff

Additionally, the DSL and Designated Safeguarding Governors will meet at least yearly with a panel of pupils to discuss issues of safety, including bullying.

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 by senior leadership.

Appropriate whistleblowing procedures are in place for such concerns to be raised. Where a staff member feels unable to raise an issue or feels their concerns are not being addressed, other whistleblowing channels are available to them:

General advice on whistleblowing can be found at <https://www.gov.uk/whistleblowing>  
NSPCC <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/>

## **33. DISSEMINATION**

The Designated Person will ensure that a copy of this policy will be made available to all members of staff, governors and volunteers. All staff will be expected to sign an annual declaration, stating they have received, read and agree to abide by this policy.

Parents' attention will be drawn to the policy through the normal school communication channels, including the school website.

Regular volunteers in the school will be provided with a copy of this policy.

The name of the DSL and DDSLs will be displayed in appropriate areas around the school.

## **SOURCE MATERIAL**

*Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads, May 2018*

*Disqualification under the Childcare Act 2006*

*Draft statutory guidance for local authorities, maintained schools, academies and free schools July 2018*

*Keeping Children Safe in Education: Statutory guidance for schools and colleges July 2025*

*Model Policy & Procedure Managing allegations against other pupils. Hants CC*

*Multi-agency guidelines: Handling cases of forced marriage June 2014*

*Multi-agency statutory guidance on FGM April 2016*

*NAHT Prevent Campaign Advice and Guidance*

*National Action Plan to Tackle Child Abuse linked to Faith or Belief, 2012*

*Recruitment and Pre – Employment Checks RBC Model policy for schools*

*Safeguarding Children and Safer Recruitment in Education, 2011, updated 2012*

*Safeguarding children in whom illness is fabricated or induced, 2008*

*Sexual violence and sexual harassment between children in schools and colleges, 2018*

*Teaching online safety in schools DFE guidelines 26th June 2019 13*

*The Prevent duty Departmental advice for schools and childcare providers, June 2015*

*The School Staffing (England) Regulations, 2009 Amendments 2015*

*Working Together to Safeguard Children, December 2023*

*Early years foundation stage (EYFS) statutory framework July 2025*

## **APPENDIX I**

### **Filtering and Monitoring Arrangements at St Anne's**

St Anne's is committed to providing a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

#### **Definition of effective filtering system**

An effective filtering system blocks internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration
- restrict students from learning how to assess and manage risk themselves (as appropriate for the age of the children)

#### **Roles regarding Filtering and Monitoring**

- The DSL and Safeguarding governors are responsible for ensuring these standards are met
- The DSL works closely together with IT service providers (Waterman Solutions) to ensure provision is appropriate for the setting

The DSL/DDSLs are responsible for:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of the provision
- overseeing reports
- making sure that all staff:
  - o understand their role
  - o are appropriately trained
  - o follow policies, processes and procedures
  - o act on reports and concerns

The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

Waterman Solutions has technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports (using template provided by the school)
- completing actions following concerns or checks to systems

Waterman Solutions works with the DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

#### **Nature of Filtering system**

The school will make sure that the filtering provider is:

- a member of [Internet Watch Foundation](#) (IWF)
- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- blocking access to illegal content including child sexual abuse material (CSAM)

The school will make sure the filtering system is operational at all times, up to date and applied to all:

- users, including guest accounts
- school owned devices
- devices using the school broadband connection

The filtering system will:

- filter all internet feeds, including any backup connections
- be age and ability appropriate for the users, and be suitable for a primary school setting
- handle multilingual web content, images, common misspellings and abbreviations
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them
- provide alerts when any web content has been blocked

In order to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff (the DSL), the filtering systems will allow identification of

- device name or ID, IP address, and where possible, the individual
- the time and date of attempted access
- the search term or content being blocked

Where the filtering system is limited in regard to any of the standards above, a risk assessment will be undertaken.

### **Role of School Staff**

All staff are made aware at induction and during annual Safeguarding refreshers of reporting mechanisms for safeguarding and technical concerns. They should report if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

### **Filtering Provision**

A review of filtering provision is undertaken and recorded as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, like remote access or BYOD
- new technology is introduced

The review is conducted by the DSL/DDSLs and the IT service provider and involve the responsible governor. The results of the online safety review are recorded for reference.

### **Effective monitoring systems**

Monitoring allows the school to review user activity on school devices. For monitoring to be effective, it must pick up incidents urgently, usually through alerts or observations, allowing the school to take prompt action and record the outcome.

### **Nature of monitoring**

Monitoring may include

- physical monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

### **Responsibility for monitoring**

Device monitoring is managed by TechResponse. They will

- make sure monitoring systems are working as expected
- provide reporting on pupil device activity
- receive safeguarding training including online safety
- record and report safeguarding concerns to the DSL
- Make sure that:
  - o monitoring data is received in a format that staff can understand
  - o users are identifiable to the school, so concerns can be traced back to an individual, including guest accounts

## **Responsibility of Staff**

Staff must:

- provide effective supervision of pupils
- take steps to maintain awareness of how devices are being used by pupils
- report any safeguarding concerns to the DSL/DDSLs

## **Implementing appropriate Filtering and Monitoring systems**

In order to implement the appropriate filtering and monitoring systems, the school will consider

- the risk profile of the pupils, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what the filtering system currently blocks or allows and why
- outside safeguarding influences, such as county lines
- relevant safeguarding reports
- the digital resilience of the pupils
- teaching requirements, including the RHSE and PSHE curriculum
- specific use of technologies
- related safeguarding and technology policies

The review will inform:

- related safeguarding or technology policies and procedures, roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

## **Content of review**

The checks will include a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

Checks use the South West Grid for Learning's (SWGfL) [testing tool](#) to ensure the filtering system is blocking access to:

- illegal child sexual abuse material
- unlawful terrorist content
- adult content

A log of checks is kept including:

- when the checks took place
- who did the check
- what they tested or checked
- resulting actions

The school will make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and pupils
- blocklists are reviewed and modified in line with changes to safeguarding risks