Safeguarding & Child Protection Policy 2025 (based on the South Gloucestershire model policy)

Document Summary

Staff Lead:	Debbie Fisher
Link Governor:	Fay Reeves and Mark Toogood
Version Number:	9.0
Document Status:	Approved
Date Last Approved:	October 2025
Date of Next Review:	October 2026
Frequency of Review:	Annually (Annual - dictated by DofE)
Model Policy:	Based on South Glos Model Policy
Statutory Policy?	Yes, known as Child Protection Policy & Procedures
On School Website?	Yes

FYI: Version control should be used for all formal documents and managed as:-

- **0.1 (1st draft version)**
- **0.2 (2nd draft and so on….. 0.3. 0.4 etc)**
- **1.0 (Once document has been approved)**
- **1.2 (during review/approval of a lifecycle document i.e. policies)**
- **2.0 (2nd approved document) and so on.**

Amendment History

Version	Amendment Date	Author	Amendment Summary
V1.0	01/11/16	Mo Jones	Reformatting Only
V1.1	16/01/17	Rosie Brydon	Changes to policy following Ofsted Guidance
V2.0	31/01/17	Rosie Brydon	Changes made by FGB
V2.1	21/02/18	Mo Jones	Annual review
V2.2	29/05/18	Ruth Owen	Removed reference to Recruitment Protocols
V2.3	04/09/18	Ruth Owen	Changed ref to keeping children safe in education to current version
V3.0	07/09/18	Ruth Owen	Final formatting following approval
V3.1	26/04/19	Ruth Owen	Formatting of new model policy

V4.0	**14/06/19**	**Ruth Owen**	**Final formatting following FGB approval and updating website**
V4.1	**29/03/20**	**Pete Barnard**	**Review following discussion at FGB**
V4.2	**24/04/20**	**Ruth Owen**	**Updated with Covid19 addendum from South Glos**
V5.0	**03/06/20**	**Ruth Owen**	**Final Formatting following approval**
V5.1	**20/09/22**	**Hannah Hornig**	**Updating South Glos new model policy**
V5.2	**20/09/22**	**Ruth Owen**	**Formatting of new model policy**
V6.0	**15/11/22**	**Ruth Owen**	**Final formatting following FGB approval and updated website**
V7.0	**18/09/23**	**Debbie Fisher**	**Updating South Glos new model policy**
V7.1	**30/09/24**	**Debbie Fisher**	**Updating South Glos new model policy**
V8.0	**05/11/24**	**Ruth Owen**	**Updated following approval at FGB**
V8.1	**13/10/25**	**Debbie Fisher**	**Updating South Glos new model policy New additions in green, parts in yellow for Governors' awareness**
V9.0	**11/11/25**	**Ruth Owen**	**Final formatting following FGB approval and updated website**

Related Policies	Attendance Allegations against staff; Anti-Bullying; Behaviour (including suspensions and exclusions); Children with health needs who cannot attend school; Code of Conduct; Complaints; Confidentiality; Data protection; Educational Visits; Equality (including anti-bullying, racist incidents and protected characteristics and sexual harassment); Grievances; Health and Safety (to include premises); Low Level Concerns Online Safety (along with separate parent/carer acceptable use and staff acceptable use policies); Recruitment; Restraint/Physical Intervention Risk register; Special educational needs and disability; Staff discipline, conduct and grievance (procedures for addressing) Statement of procedures for dealing with allegations of abuse against staff Supporting pupils with medical conditions and Whistle-blowing Link to list of all statutory policies for schools and academy trusts (document link)
Chair of Governor's Signature	A.Norman

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices:	Safeguarding and Child Protection Policy	**DATE:**	13.10.25
EIA CARRIED OUT BY:	D Fisher	**EIA APPROVED BY:**	N Addicott

Groups that may be affected:

Are there concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for a positive impact
Age (young people, the elderly; issues surrounding protection and welfare, recruitment, training, pay, promotion)		
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication)		
Gender reassignment		
Marriage and civil partnership		
Pregnancy and maternity		
Race		
Religion and belief (practices of worship, religious or cultural observance, including non-belief)		
Gender identity		
Sexual orientation		

Any adverse impacts are explored in a Full Impact Assessment.

1) Purpose of the Policy

At Frampton Cotterell CofE Primary School we are committed to creating and embedding a culture of vigilance which:

- Ensures we maintain an attitude of "It could happen here"
- Ensures that our learners and staff are safe and protected
- Ensures that our learners and staff know who to talk to if they have concerns and are assured that their voices are heard
- Ensures that our learners are supported, protected and informed and that staff are following processes to support this
- Ensures that our learners are safe from discrimination and bullying
- Ensures that our learners recognise when they are at risk and know how to get help when they need it including when they are off the school site
- Ensures that our learners understand how to keep themselves safe as part of a broad and balanced PSHE and online safety curriculum
- Focuses on preventative work in relation to trauma and adverse childhood experiences (ACEs) and takes a trauma-informed approach

- Ensuring our process and practices are regularly reviewed to take account of any new risks and or guidance.

This policy applies to all staff, students, governors, cover staff, contractors and volunteers.

Information Sharing

The school's information sharing policy is based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).

KCSIE 2025, paragraph 55: DPA and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
KCSIE 2025, paragraph 118: Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.
This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk, and
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. 36 For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.

1.1 We take seriously our statutory and moral responsibilities to protect and safeguard the welfare of the children and young people in their care - "The welfare of the child is paramount." (Children Act 1989)

1.2 We will follow procedures set out by the South Gloucestershire Children's Partnership, which comprises of the council, the ICB and the Police and take account of guidance issued by the DFE and the Local Authority (LA). The school will work under these arrangements as a named partner
http://sites.southglos.gov.uk/safeguarding/children/

1.3 We recognise that staff, because of their contact with and knowledge of children or young people in their care, are well placed to promote the well-being of children, protect them from harm, and respond to child protection or safeguarding concerns.

1.4 As part of the ethos of the school, the staff and governors are committed to:

- ensuring the school practises safe recruitment in checking the suitability of staff and volunteers to work with students (include link to your updated safer recruitment policy)

- ensuring that all staff and volunteers understand, and adhere to, the school's code of conduct
- ensuring there is a robust induction process in place so that new staff and volunteers understand relevant safeguarding policies and procedures
- student health and safety
- proving first aid as and when required
- having clear processes regarding intimate care
- meeting the needs of our students with medical conditions
- having systems which support early identification and early help through the early help assessment process
- developing Inclusive practice which promotes the voice of the child and seeks to reduce the barriers that students from vulnerable backgrounds may have and which may in turn affect their mental health and wellbeing, as well as their ability to share information about maltreatment and abuse
- establishing and maintaining a safe school environment, where all students feel secure, can learn and develop, are encouraged to talk and are listened to;
- including opportunities in the strands of the PSHE, computing curriculum and whole school approach to care, guidance and support, for students to develop the skills they need to recognise, and stay safe from abuse
- using the updated guidance on Teaching Online Safety in school January 2023 and the Education for a Connected World framework (document link) to review the learning opportunities for students in school (document link)
- having regard to the DfE statutory guidance updated 2021 relationships education which is compulsory in all Primary Schools and that relationships and sex education is compulsory in all secondary schools (guidance link)
- review and use issues as learning experiences to revise processes.
- ensuring all teaching and support staff are aware of signs and symptoms of abuse, know the correct procedure for referring concerns or allegations against staff and receive appropriate training to enable them to carry out these requirements
- ensuring all volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection
- exercising their duty to work in partnership with other agencies and to share information with them, including attendance at child protection conferences, core groups and preparation of reports for conferences
- encouraging and supporting parents/carers, working in partnership with them
- supporting students in accordance with their agreed child protection plan
- a child centred approach, making it clear what our staff should do to keep children safe
- ensuring students know they can talk to staff confidentially by reminding them in assemblies, updating the student safeguarding board and signposting them as required. Best practice would be for schools to offer a range of ways for children and young people to share concerns so please list all ways that are available in your school

Safeguarding Young People

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment

- preventing impairment of children's mental health and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

2) Roles & Responsibilities

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is a member of the school's Senior Leadership Team. Our DSL is Debbie Fisher (Headteacher). The DSL takes responsibility for Child Protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The Deputy Safeguarding lead is Siobhan Barter

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

The DSL can be contacted out of hours using the email headteacher@fcceprimary.co.uk

When the DSL is absent, the deputy will act as cover and can be contacted using Siobhan.barter@fcceprimary.co.uk

If the DSL and Deputies are not available, please call the Access and Response Team at South Gloucestershire LA on 01454 866000.

All trips leaving the school will have the DSL mobile telephone number on their trip pack information.

3.1 All staff will be made aware of who the Designated Safeguarding Lead is and what their role is

3.2 Annex C, KCSIE 2025, sets out clearly the role of the DSL in schools.

The role of the Designated Safeguarding Lead

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the designated safeguarding lead. This responsibility should not be delegated.

Managing referrals

The designated safeguarding lead is expected to:

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

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners (Local authority, the BNSSG and the chief officer of police for an area any part of which falls within the council area).
- liaise with the headteacher to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirements for children to have an appropriate adult.
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (especially pastoral support staff, subject leaders, school nurses, IT Technicians, site staff, service providers and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.

  This includes:
  - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
  - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social

care intervention has ended, there is still a lasting impact on children's educational outcomes. (KCSIE 2025 page 173)

Training

The Designated Safeguarding Lead and any deputies will be trained to an advanced level by attending South Glos certified Advanced Inter-agency Child Protection training and this will be maintained by attending South Glos certified CP Update training every 2 years thereafter. The DSL will attend DSL forums to ensure they are up to date with the latest safeguarding information and sharing of best practice. The DSL will undertake Prevent awareness training. This training will provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care, so they can:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's safeguarding and child protection policy and reporting procedures, especially new and part time staff
- ensure all new staff attend safeguarding induction training and that relevant staff and Governors have read and understood Part 1 and Annex B (if working directly with children) and Annex A (if not working directly with children) of KCSIE 2025
- provide a yearly update training session during INSET to all staff as well as on-going CPD informed by information shared at the DSL forums during the year for staff to support the culture of safeguarding
- are alert to the specific needs of children
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, within the school, and with the three safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals using CPOMs and monitor these regularly
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or at home
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking into account their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via bulletins, meeting other designated safeguarding leads at DSL Forums and participating in training and school reviews, or

simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role

- ensure all staff have regular update updated online safety training, including an understanding of all the expectations, roles and responsibilities around filtering and monitoring.
- Keep a training plan for the school which shows all training throughout the year
- Develop a curriculum that supports children to learn about safeguarding risks and how to keep themselves safe
- Update Governors about issues related to their responsibilities

Raise Awareness

The designated safeguarding lead will:

- ensure the school's safeguarding and child protection policy is known, understood and used appropriately
- ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect will be made (in cases of immediate risk to a child this will be done without consent from the parent/carer) and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with all school staff so that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort
- support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child protection file

Where children leave the school or college, the designated safeguarding lead must ensure their child protection file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges must ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives. More information on the child protection file is in Annex C (KCSIE 2025)

Availability
During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media is acceptable.
Emergency contact details (including phone number) are shared with the Local Authority to be used during holidays for strategy discussions, Initial Child Protection Conferences or Review Conferences and in the case of an emergency.

Reporting
The DSL will report the number and category of safeguarding concerns as part of the Head's Report to the governing body at least 3x a year.

School safeguarding profile

Our safeguarding analysis has shown that our main concerns are in the area of parent/carer mental health and parental conflict at home. These can lead to emotional abuse. There are also concerns around emotional based school avoidance.

Our school will be alert to the potential needs of the following vulnerable children in relation to safeguarding and child protection and in their need for early help:

Children and young people with **special educational needs and disabilities** can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers;
- children with special educational needs, without an EHCP could be more vulnerable;
- they are often isolated, may have difficulty in communicating effectively and lack confidence to talk to adults

Our internal support processes will ensure that students with SEN and disabilities have adequate pastoral care.

Other vulnerable groups that we monitor closely that may need early help processes in place students who:

- have English as an additional language
- are young carers
- have previously suffered child-on-child abuse
- are showing signs of engaging in anti-social or criminal behaviour
- have previously been looked after and are now adopted from care as they remain potentially vulnerable
- are misusing drugs or alcohol
- are at risk of being radicalised or exploited
- are privately fostered children

- are at risk of modern slavery, trafficking and or exploitation, such as county lines
- are in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence
- have returned home to their family from care
- are showing early signs of abuse and/or neglect
- where contextual safeguarding issues are known

Preventing Harm

We recognise that developing the necessary qualities (e.g. emotional resilience, self-confidence) within both the children themselves and the school as a whole can help to prevent harm.

The school will therefore:

- establish and maintain an ethos where children and young people feel secure, are encouraged to talk and are listened to
- ensure children and young people know that there are adults in the school who they can approach if they are worried or in difficulty
- educate pupils about safeguarding, including online safety, through various teaching and learning opportunities as part of our broad and balanced curriculum. Included are the curriculum activities and opportunities that equip children and young people with the skills they need to stay safe from abuse and ensure that they know who to turn to for help, mainly through our PSHE, online safety programme and sex and relationships education programme.
- include in the curriculum materials which will help children and young people develop realistic attitudes to the responsibilities of adult life, particularly with regard to the care of children and young people.

Early Help

KCSIE 2025 states that **"All** staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years". Staff should discuss early help requirements with the DSL (or a deputy). We follow the South Gloucestershire early help process which includes the use of the Early Help Assessment and Plan (EHAP). It may be appropriate for a member of school staff to initiate an EHAP and take on the role of Lead Professional or become a member of a Team around the Child/Family (TAC/F) as part of the EHAP process. If this is the case, then the staff member should be supported by the DSL, for example, by being given time to write the EHAP and attend TAC/F meetings. All staff should have an understanding of the EHAP process and how they can contribute to it as and when appropriate.

Designated Governor

The Designated Governor/s for Safeguarding at this school are Mark Toogood and Fay Reeves and they can be contacted on the following emails mark.toogood2@fcceprimary.co.uk and fay.elizabethreeves@fcceprimary.co.uk

The responsibilities of governing bodies, proprietors and management committees are outlined in part two of KCSIE 2025 and in the Governor Handbook

Local Authority Designated Officer (LADO)
Jon Goddard. Contact details are:
Tel. 01454 868508
Email. lado@southglos.gov.uk
The first reporting point for any allegation raised needs to be a schools senior manager and then referred on to LADO, if it is believed that the Allegations Management threshold has been reached. If parents make allegations these should be directly to the school and not LADO. Any parental raised matter should also be considered under the Complaints procedure upon completion of an investigation, if they are not satisfied with the outcome & as such the school should follow their complaints policy. The LADO is a professional facing role and deals with Headteachers, Governors and DSLs directly and will not communicate directly with parents/carers.

3) Types of abuse and specific safeguarding issues

Child abduction and community safety incidents
Child Exploitation (including both criminal and sexual)
Child-on-child abuse
Children Missing from Education
Children absent from Education
Children with a social worker
Children and the Court System
Children with family members in prison
County Lines
Cybercrime
Domestic Abuse
Drugs
Fabricated illness
Faith Abuse
Female Genital Mutilation (FGM) & FGM mandatory reporting duty for teachers
Forced Marriage
Homelessness
Honour based Abuse
Mental Health
Private Fostering
Serious youth violence and risks of involvement
Sexting
Sexual violence and sexual harassment between children in schools and colleges
Teenage abusive relationships
The Prevent duty - Preventing radicalisation and being drawn into extremism
Trafficking and modern slavery (including the National Referral Mechanism)
Upskirting

Indicators of abuse and neglect

ABUSE

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. (see paragraph 24 in KCSIE 2025)

PHYSICAL ABUSE

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (see paragraph 25 in KCSIE 2025)

EMOTIONAL ABUSE

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. (see paragraph 26 in KCSIE 2025)

SEXUAL ABUSE

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. (see paragraph 27 in KCSIE 2025).

NEGLECT

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

neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (see paragraph 28 in KCSIE 2025)

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

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or 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 and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. (KCSIE 2025 paragraph 34)

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. (KCSIE 2025 paragraphs 35-37)

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.
Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. (KCSIE 2025 paragraphs 38-40)

In response to Child Exploitation we as a school are confident in identifying the signs of exploitation and use the Risk Outside the Home (ROTH) toolkit to do this. We refer all concerns around exploitation to ART and include a Risk Outside the Home Tool (ROTH tool) with the referral. We are aware of the South Glos way with regards to identifying and risk management for children and young people who are being exploited or at risk of serious young violence. Risk Outside the Home (ROTH) | SafeguardingSouth Gloucestershire Safeguarding

Contextual Safeguarding (Extra Familial Harm)

Safeguarding incidents and/or behaviours can be associated with factors outside of school and can occur between children outside of school. All staff, but especially the DSL and Deputy DSL, will consider the context within which such behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that a threat to their safety and welfare. We will ensure that such information forms part of the referral we make to the Social Care teams.

Children who are Absent from Education
Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and guidance on school attendance can be found: Working together to improve school attendance , including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

Children Missing Education (CME)
In response to the guidance in KCSIE 2025 the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:

a. leave school to be electively home educated
b. move away from the school's location
c. remain medically unfit beyond compulsory school age
d. are in custody for four months or more (and will not return to school afterwards)
e. are permanently excluded

We ensure that where a child is taken off our roll this is in the best interests of the pupil.

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

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

Children with a social Worker

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

We ensure that children have regular Emotional Literacy Support Sessions to provide their 'voice' and ensure relevant staff members take responsibility for liaising with external agencies.

County Lines

County lines is a term used to describe organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. (Definition from KCSIE 2025) [County Lines Toolkit For Professionals | The Children's Society]

- Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:
- go missing (from school or home) and are subsequently found in areas away from their home

- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. (KCSIE 2025 page 154/155)

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. <u>The duty does not apply in relation to at risk or suspected cases</u>. All other staff should share concerns directly with the Designated Safeguarding Lead and do not need to contact the police personally.

Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms

of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Mental Health

All staff at are aware that mental health problems can, in some cases, be an indicator that a child may put themselves at risk or has suffered or is at risk of suffering from abuse, neglect or exploitation.

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

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy through the normal safeguarding referral processes.

The Prevent duty
[Note there is no requirement to have a separate policy for the Prevent duty, but schools in higher risk areas might wish to do so. All schools do need to complete their own risk assessment]

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

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead and staff have received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet and mobile technology.

Staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society. At Frampton, we promote British Values through whole-school assemblies and explicit teaching within lessons such as PSHE, History, and other relevant subjects. These opportunities help pupils understand and apply the core principles of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- Looking up to inappropriate role models that promote extremism e.g. misogyny
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent Duty does not require teachers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

The safeguarding procedures outlined above need to be followed in exactly the same way should staff have a concern about potential radicalisation or undue influences.

As a school we have completed our DfE Prevent duty risk assessment which is bespoke to our school and local community. DfE risk assessment template and guidance here

Child-on-child abuse, including sexual violence, sexual harassment and upskirting.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below.

Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff need to be aware of children watching having access to pornography and the impact this will have on them forming healthy relationships. Any concerns need to be reported to the DSL.

- Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual
- harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing
- someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or
- videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person’s clothing
- without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving
- harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and offline (both verbal and physical) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.
Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh”, or “boys being boys”
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

We believe that all children have the right to attend school and learn in a safe environment. Children should be free from harm by adults in school and other students.

It is recognised that some students will at times negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

At school we will support pupils by listening to everyone involved and treating everyone with respect. We will follow school safeguarding procedures, as appropriate, and take the necessary steps to support all of those involved. We will also utilise our ELSA staff to provide support to all of the children involved.

Harmful Sexual Behaviour (HSB)

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

A useful umbrella term is The Voyeurism (Offences) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

"harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

HSB can, in some cases, progress on a continuum.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma.

It is important that they are offered appropriate support.

Serious Youth Violence (SYV)

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 or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or groups and may be at risk of criminal exploitation. (KCSIE 2025 paragraph 46)

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious youth violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement guidance here and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Sharing nudes and semi-nudes

In cases of 'sharing nudes and semi-nudes' we will follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS) published in February 2024 – 'Sharing nudes and semi-nudes – advice for education settings working with children and young people (document here)

Your responsibilities when responding to an incident:

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (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.

Sexual Activity and the under 18s

A précis of the Law regarding Sexual Activity and U18s

The age of consent for all sex is 16, whether straight, gay, trans or bi-sexual. The Sexual Offences Act 2003 makes it easier to prosecute people who pressure or force others into sexual activity.

Under 16s

If under 16 activity is consensual it may be less serious than if the child were under 13 but may nevertheless have serious consequences for the welfare of the young person. Consideration should be given in every case involving a child aged 13-15 as to whether there should be a discussion with other agencies and whether a referral should be made to children's social care. The younger the child, and the wider the age gap between participants, the greater the concern (even 3 years' age difference may be worrying if one of the children is young and/or vulnerable). Where confidentiality needs to be preserved, a discussion can still take place as long as it does not identify the child (directly or indirectly).

Under 13s

A child under 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity. In all cases where the sexually active young person is under the age of 13, there must be a formal recorded consultation with the Children & Young People Social Care.

16 & 17 Year Olds

Although sexual activity in itself is no longer an offence over the age of 16, young people under the age of 18 are still offered the protection of Child Protection Procedures under the Children Act 1989. Consideration still needs to be given to issues of sexual exploitation through prostitution, and abuse of power. Although they may be over 16, young people under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust/authority, or a family member as defined by the Sexual Offences Act 2003.

Sharing Information with Parents

If a young person is under 16, professionals should encourage the young person, at all points, to share information with their parents wherever safe to do so. However parental consent or sharing of the information with a parent is not a requirement if a young person under 16 can understand the issues and appreciate the consequences. This also applies to those living in care. Decisions to share information with parent will be taken using professional judgement, and the Child Protection Procedures.

Giving Advice, Contraception &/or Access to Services to Under 16s

Under the Sexual Offences Act 2003, youth support workers **can** help young people under 16 (including under 13s, but see section above) to seek contraception and sexual health advice/services (including giving out condoms), without being seen to facilitate an illegal act.

Any intervention must take place within the Fraser Guidelines and Child in Need/Child Protection Procedures

Practitioners using the Fraser guidelines should be satisfied of the following (taken from NSPCC website):

- the young person cannot be persuaded to inform their parents or carers that they are seeking this advice or treatment (or to allow the practitioner to inform their parents or carers).
- the young person understands the advice being given.
- the young person's physical or mental health or both are likely to suffer unless they receive the advice or treatment.
- it is in the young person's best interests to receive the advice, treatment or both without their parents' or carers' consent.
- the young person is very likely to continue having sex with or without contraceptive treatment.

Child protection concerns

When using Fraser guidelines for issues relating to sexual health, you should always consider any potential child protection concerns:

- Underage sexual activity is a possible indicator of child sexual exploitation and children who have been groomed may not realise they are being abused.
- Sexual activity with a child under 13 should always result in a child protection referral.
- If a young person presents repeatedly about sexually transmitted infections or the termination of pregnancy this may be an indicator of child sexual abuse or exploitation.

We will always consider any previous concerns that may have been raised about the young person and explore whether there are any factors that may present a risk to their safety and wellbeing.

We will always share child protection concerns with the relevant agencies, even if a child or young person asks us not to.

Private Fostering

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or can be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff will notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements. notification form

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

Online Safety redo all from KCSIE 25 page 39

We have an effective whole school approach to online safety in order to protect and educate pupils and staff in their use of technology. We have mechanisms to identify, intervene in, and escalate any concerns where appropriate.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan. Use of the internet has many benefits for learning however when used inappropriately this can put pupils at risk. Filtering and monitoring systems on their own are not sufficient to address this and pupils need to be provided with clear guidance on how to keep themselves safe and minimise these risks both in and outside school.

To address this, as a school we teach children about e-safety. We also do not allow the children to use their own data on mobile phones or additional devices in school. The school's filtering and monitoring system is run by Integra, who monitor all logs on their systems. Firewalls and anti-malware solutions are in place to ensure no malicious activity is present. They have systems in place that notify them instantly when any suspicious activity is detected on the network or on the device and these are investigated (and remediated where necessary) with the appropriate urgency. In the event of inappropriate content being viewed or searched, the school are notified so that it can be investigated. This may result in a conversation with the child and/or parent/carer and depending on the outcomes, other safeguarding steps may be taken. There are different levels of protection on pupil and staff accounts and staff can request for sites to be blocked or unblocked depending on the curriculum content. E-safety lessons will be used in school to support children when they are accessing online learning out of school. Children will be informed of the importance of

telling an adult, either at home or in school, if they see something they think is inappropriate or if they are worried about anything online, such as someone trying to contact them.

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

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: 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: online behaviour that increases the likelihood of, or causes, harm; for example, 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. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (link here) (KCSIE 2025 pg 38-42)

We train staff, as part of their induction, on safe internet use, filtering and monitoring and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members have annual refresher training.

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online
- Know the procedures for reporting any issues they become aware of immediately to the school to minimise risk to their own and other children and so that the school can take appropriate action.
- We will use the school website, social media platforms and parent newsletters to offer advice and guidance to parents in relation to online risks.

Ensure all staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that: [insert here your expectations around this e.g. when are staff allowed phones etc and that no photos of students are ever permitted …]

We have a clear agreement in place for all learners, parents/carers, staff, volunteers and governors to sign to say that they are aware of what the schools acceptable use of internet in school, use of the school's ICT systems and use of their mobile and smart technology. [there is not a template for this as it will depend on your own schools expectations and schools community as to the wording etc]

The Management of Safeguarding local governing board or trustees

The Governing Body (GB) will have a Designated Governor with responsibility for Safeguarding; these are **Fay Reeves and Mark Toogood.**

The Designated Governor will ensure that they utilise the experiences and expertise of staff when shaping safeguarding polices. Opportunities for staff to contribute to safeguarding arrangements and child protection will be provided. They will also be responsible for jointly undertaking the annual 175 safeguarding audit with the Headteacher and Designated Safeguarding Lead. An action plan following the audit will be produced and the LGB will ensure that any actions are met in a timely manner.

The GB will receive the Annual Safeguarding Report, usually in term 2, for the previous academic year and will review safeguarding practices in the school no less than annually to ensure that:

- The school carries out its statutory duties related to child protection and safeguarding, including the South Gloucestershire Children's Partnership requirements
- Sufficient resources are made available to enable necessary tasks to be carried out properly under inter-agency procedures
- Governors attend Child Protection / Safeguarding training
- Only persons suitable to work with children shall be employed in the school or work in a voluntary capacity as detailed in KCSIE 2025
- Where safeguarding concerns about a member of staff are substantiated, appropriate action is taken.

The LGB will delegate responsibility for day-to-day procedures that ensure the smooth operational practice for safeguarding arrangements to the Headteachers and Designated Safeguarding Leads; this may be reported to Governors retrospectively.

Children missing from education

The LGB will ensure that appropriate safeguarding responses to children who go missing from education are in place, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risk of them going missing in future.

Where reasonably possible, the school will hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

The LGB will ensure that weaknesses identified within the Annual report; through on-going monitoring of safeguarding and child protection procedures and other sources, are addressed explicitly within the School Improvement Plans. The governing body will regularly monitor the implementation and impact of the identified actions.

The LGB will ensure that appropriate filters and monitoring systems are in place for the school and will identify the steps required to ensure that the monitoring of internet use, particularly for vulnerable students such as those with special education needs and disabilities, is robust. Advice and recommendation from the Safer Internet Centre will be used to fulfil this role.

The LGB controls the use of the school premises both within and outside school hours and has a duty to safeguard children and young people using the premises. Where services or activities are provided separately by another body, the LGB will seek assurances that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection. Children Missing Education - Guidance for Local authorities

HR/Personnel Lead

Part 3 of KCSIE 2025 sets out clearly the requirements and processes in relation to Safer Recruitment and these are fully detailed in the school's safer recruitment policy.This needs to include details around safer recruitment training.

In addition to the requirements within Schools Recruitment policy, the HR/Personnel Lead will ensure that:

- All volunteers to the school have read either Part 1 (if working directly with children) or Annex A (if not working directly with children) of KCSIE 2025
- All staff have read Part 1 (if working directly with children) or Annex A (if not working directly with children) of KCSIE 2025 and this is recorded on the SCR
- All staff have completed their Prevent training (training link here) and this is recorded on the SCR
- Keep records of online staff training and the signing requirements for policy reading

The HR/Personnel Lead/ Business Manager will ensure that the school's Single Central Record (SCR) is accurately maintained as an ongoing, accurate and live record and includes any enquiries made regarding disqualification by association.

In relation to induction and training of new staff, the HR/Personnel Lead and/or Headteacher/Line Manager will ensure that they:

- Use a safeguarding induction checklist and retain this in the front of the staff file, ensuring that staff have copies of all of the policies required
- Have Safeguarding and Child Protection training on induction
- Have read and signed as understood the School's Code of Conduct
- Understand, under legislation, their duty to provide information which would disqualify them by association

All staff

The school has a duty to ensure that professional behaviour applies to relationships between staff and young people and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. Information on Professional and Personnel Relationships

Staff should be explicitly aware of the dangers inherent in:

- working alone with a young person
- physical interventions
- cultural and gender stereotyping
- dealing with sensitive information
- giving to and receiving gifts from students and parents

- contacting young people and parents/carers through private telephones (including text), email or social networking sites.
- disclosing personal details inappropriately
- meeting students / young people outside school hours or school duties
- using their personal phones to take pictures of students, which is not permitted under any circumstance

If a member of staff has reasonable suspicion that a young person is suffering harm and fails to act in accordance with this policy and South Gloucestershire Partnership procedures, this will be viewed as misconduct and appropriate action will be taken by the Headteacher or Governors/Trustees if the concern relates to the Headteacher.

Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that abuse may have occurred **must** report it immediately to the Designated Safeguarding Lead or their Deputy in their absence. **Confidentiality must be maintained and information relating to individual students/families shared with staff on a strictly need to know basis.** It is then the reporting member of staff's personal responsibility to follow up with the Designated Safeguarding Lead.

All members of staff have a duty to attend whole school training on safeguarding children that will enable them to fulfil their responsibilities in respect of safeguarding and child protection effectively; this training will be provided by the Designated Safeguarding Lead and Deputy DSL every year.

Induction safeguarding Training – this is mandatory and will include types of abuse and indicators of abuse, the schools safeguarding systems, key personnel, the early help process, what to do if a child disclosures abuse, how to manage confidentiality, what to do if they have concerns about a member of staff, the requirements of recording and reporting, online safety, child exploitation, child-on-child abuse, sexual violence and harassment, upskirting, response to children going missing from education, FGM and Prevent. New staff will complete the safeguarding checklist which will include:

- the child protection and safeguarding policy;
- the behaviour policy;
- Staff code of conduct;
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

All staff will then receive regular training updates throughout the year in addition to their yearly updated training on the types and signs of abuse and school specific training.

Female genital mutilation (FGM) Whilst all staff must speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a statutory duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. KCSIE 2025 page 162 for further information.

Primary Specific

The Headteacher of the Primary phase/school will:

- Ensure that the relevant staffing ratios are met, where applicable
- Make sure each child in the Early Years Foundation Stage is assigned a key person
- Where appropriate, inform Ofsted of allegations and actions taken, within the necessary timescale
- Take account of requirements including those related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.8 pg 23).
- Note the requirements set out in paragraph 3.75 of the statutory framework for the Early Years Foundation Stage
- Fulfill the requirements for a paediatric first aider to be on site and all schools trips where required . The certificate is for a full course and complies with the criteria set out in Annex A of the Early Years Foundation Stage guidance.

Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the schools Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is **0800 028 0285** or you can contact them by emailing them directly using help@nspcc.org.uk

Parents

School is committed to helping parents/carers understand its responsibility for the welfare of all students.

Parents/carers will be made aware of the school's Safeguarding and Child Protection Policy via the school's website, initial meetings with parents of new students and prospectuses; full copies of the policy will be available upon request to the school.

Where possible, Child Protection concerns should be discussed with parents/carers by the DSL or Deputy DSL, who ideally should seek agreement to making a referral, unless to do so would place the student at increased risk of significant harm; however, a lack of agreement should not stop a referral going ahead.

Where possible the school will endeavour to provide support for parents/carers in meeting their responsibilities for their child's welfare; signposting to other agencies which may support, such as Parenting Courses.

Parents are required to provide the school with two emergency contact numbers.

Implementation

Procedures for Referral

Following a safeguarding concern raised where a child is at risk of immediate harm or has been harmed, the designated safeguarding lead or deputy safeguarding lead will immediately inform Social Care Teams by telephone:

South Glos. Access and Response (Student's home postcode falls within South Glos)
Telephone number 01454 866000

Bristol Children's Services (Student's home postcodes fall within Bristol)
Telephone number 0117 9038700

All other safeguarding concerns must be reported to the DSL without delay and recorded appropriately on the school system (insert system here) The DSL will then decide if a referral needs to be made.

If the DSL or DDSL are not available, staff should speak to a member of the SLT and/or take advice from local children's social care using the numbers above.

The DSL or DDSL will contact the Local Authority Designated Officer (LADO), Jon Goddard on 01454 868508 or lado@southglos.gov.uk in relation to allegations against a member of staff

It is important to remember that options in response to staff raising a concern may not lead to a referral to ART being made. This would always follow a discussion with the DSL. Other options may include:

- Managing the support for the student internally through our own integrated student support processes
- An early help assessment, which staff might be required to help with or lead on
- A referral to a statutory service e.g. CAMHS

If in exceptional circumstances, the DSL or Deputy DSL are not available, this should not delay appropriate action being taken by the member of staff.

If requested, the telephone referral to the Social Care Team will be confirmed as a written referral within a maximum of 24 hours, with a copy placed on the student's Child protection record (CPOMs) maintained by the Designated Safeguarding Lead. Essential information will include student's name, address, date of birth, family composition, and reason for referral, name of person receiving the referral and any advice given.

Record Keeping

Any member of staff receiving a disclosure of abuse, or noticing possible abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event into

context, and giving the date, time and location. All records must be dated and signed and discussed with the Designated Safeguarding Lead or Deputy Safeguarding Lead.

All hand-written records will be retained, even if they are subsequently typed up in a more formal report and these will be uploaded to CPOMs.

Written records of concerns about students should be kept, even where there is no need to make an immediate referral. Where concerns do not meet the threshold for a referral to Social Care, consideration should be given to the appropriateness of completing an Early Help assessment.

In line with the South Gloucestershire CSE strategy, the DSL and Deputy DSL will be alert for any indicators that a child is at risk of child sexual exploitation and, if required, will complete an Exploitation Identification Tool and pass concerns directly to Access and Response.

All records relating to child protection concerns will be kept in a secure cabinet or secure online space and will remain confidential. The secure online platform is CPOMs. They do not form part of the student's educational records and should be retained separately and are not required to be disclosed to parents/carers, except by agreement with the school.

A chronology will be kept of individual student concerns using CPOMS, which is reviewed and updated whenever a new concern is raised, noting any action.

Child protection records must be kept for a minimum of 25 years after the student has reached the end of compulsory education; the school will also retain all additional safeguarding records for 25 years in a confidential archive separate from a students' individual file.

DSL and SLT undertake regular monitoring and reviews of records as this can reveal patterns or emerging concerns which could indicate a safeguarding concern.

Allegations made against staff

Part 4 of KCSIE 2025 sets out the responsibility of schools in relation to managing allegations against staff and these are set out fully in the **Schools Managing Allegations against Staff** policy. This guidance will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

Then the allegation will be dealt with in accordance with national guidance and agreements, as implemented locally by the South Gloucestershire Children's Partnership

Allegations against a member of staff should be brought to the attention of the Headteacher and/or DSL in the first instance, unless the Headteacher is the subject of the allegation; in this situation the allegation should be referred to the Chair of Governors. They will follow the LA 'Guidance for Chairs of Governors Dealing with Child Protection Allegations Against the Headteacher' and will contact the Local Authority Designated Officer (LADO) without delay. If the Designated Safeguarding Lead is the subject of the allegation (and they are not the Headteacher) then this needs to be brought to the attention of the Headteacher.

An allegation must not be discussed with the alleged perpetrators or other members of staff / governors, unless advised to do so by a LADO. All concerns against a member of staff must be reported without delay.

These procedures are also included in staff training.

Physical Contact, restraint and the use of reasonable force

Members of staff may have to use physical interventions with children; this should only be done where:

- It is necessary to protect the child, or another person, from immediate danger, and
- Where the member of staff has received suitable training such as positive handling training e.g. Team Teach
- Individual plans for vulnerable children to reduce risk, such as those with SEN and disabilities are in place
- Use of reasonable force applies to students with or without SEN

All physical contact and or restraint is accurately recorded (insert documentation used by school)

Photographing Children in school

We request permission to take photos of children at school and ensure that these are not shared on social media, if requested by parents. We regularly request that parents do not share photographs or videos of children online.

We will not allow images of students to be used on school websites, publicity, or press releases, without express permission from the parent/carer, and if we do obtain such permission, we will not identify individual children by name.

The school cannot however be held accountable for photographs or video footage taken by parents/carers or members of the public at school functions. Where possible, we tell families at the start of school events, such as Nativities, that photographs/videos taken should not be shared online and that the school is not responsible if parents do this.

Photography will be used across the school as a tool to support assessment and to provide evidence of, and celebration of, curriculum coverage. However, staff will not use personal cameras or mobile phones to take photographs of children; all photographs will be taken on school cameras or devices.

Staff are not permitted to use their own mobile devices or personal cameras to take pictures of students or pupil work in the school. However, on some occasions, where suitable technology is not available, it may be necessary for a personal mobile phone to be used to take photographs but these are deleted immediately after they have been uploaded for school purpose.

Staff can bring their mobile devices into school but these must not be used in front of children. They should be stored in a cupboard or away from students. Schools with Early Years settings must ensure they comply with the safeguarding requirements see link EYFS statutory framework for group and school-based providers

Visitors to the school must be reminded when signing in that they cannot have their mobile phones out whilst on the premises. A sign is displayed in the foyer.

Low-level concerns

All low-level concerns must be shared with the DSL or Headteacher. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO (as per KCSIE 2025 pg 107).
- The school has a Low Level Concern policy and LADO can be consulted for advice

Monitoring & Review

The LGB are responsible for overseeing the implementation of this policy, monitoring and evaluating its impact; they will also review it every year, or sooner if appropriate.

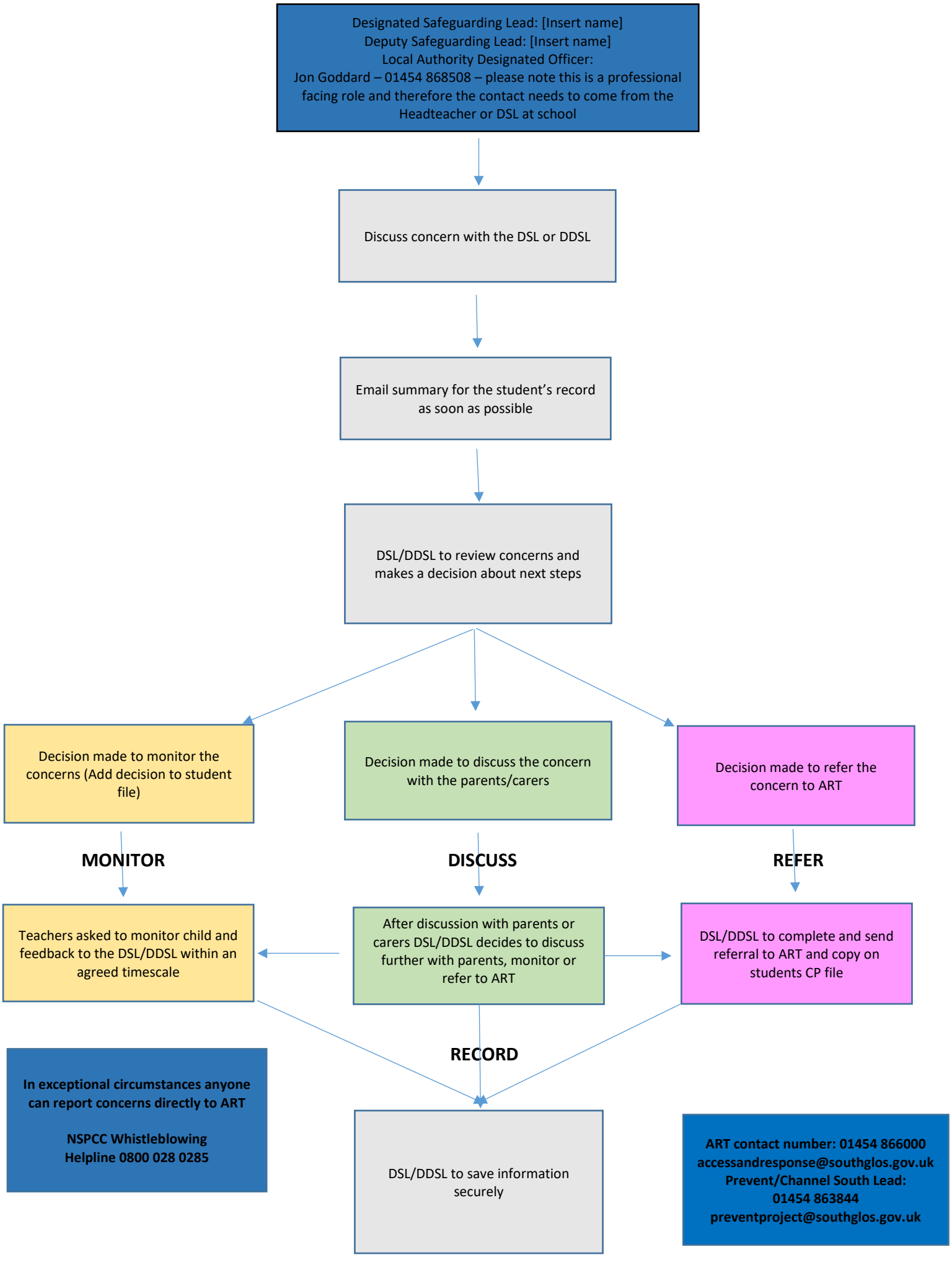
The Designated Safeguarding Lead will, on behalf of the Headteacher, complete an annual audit of Child Protection and Safeguarding to evaluate the effectiveness of the school's procedures.

Ratification
Approved by the LGB

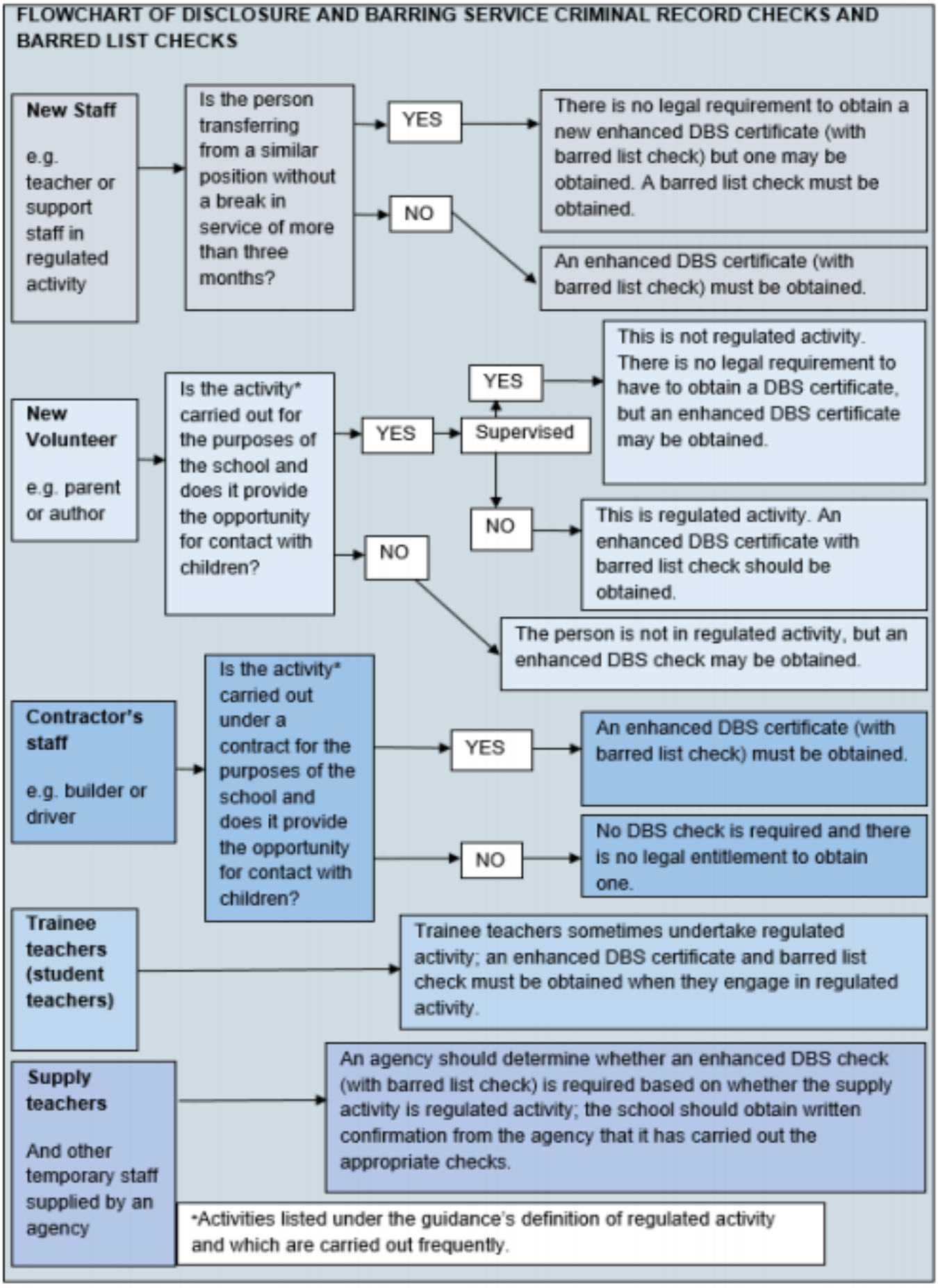
Publication
This policy can be found on the school website, and the Staff Shared drive in school

Review
Annual Audits produced by the Designated Safeguarding Leads for School Committees in Term 4 each year.

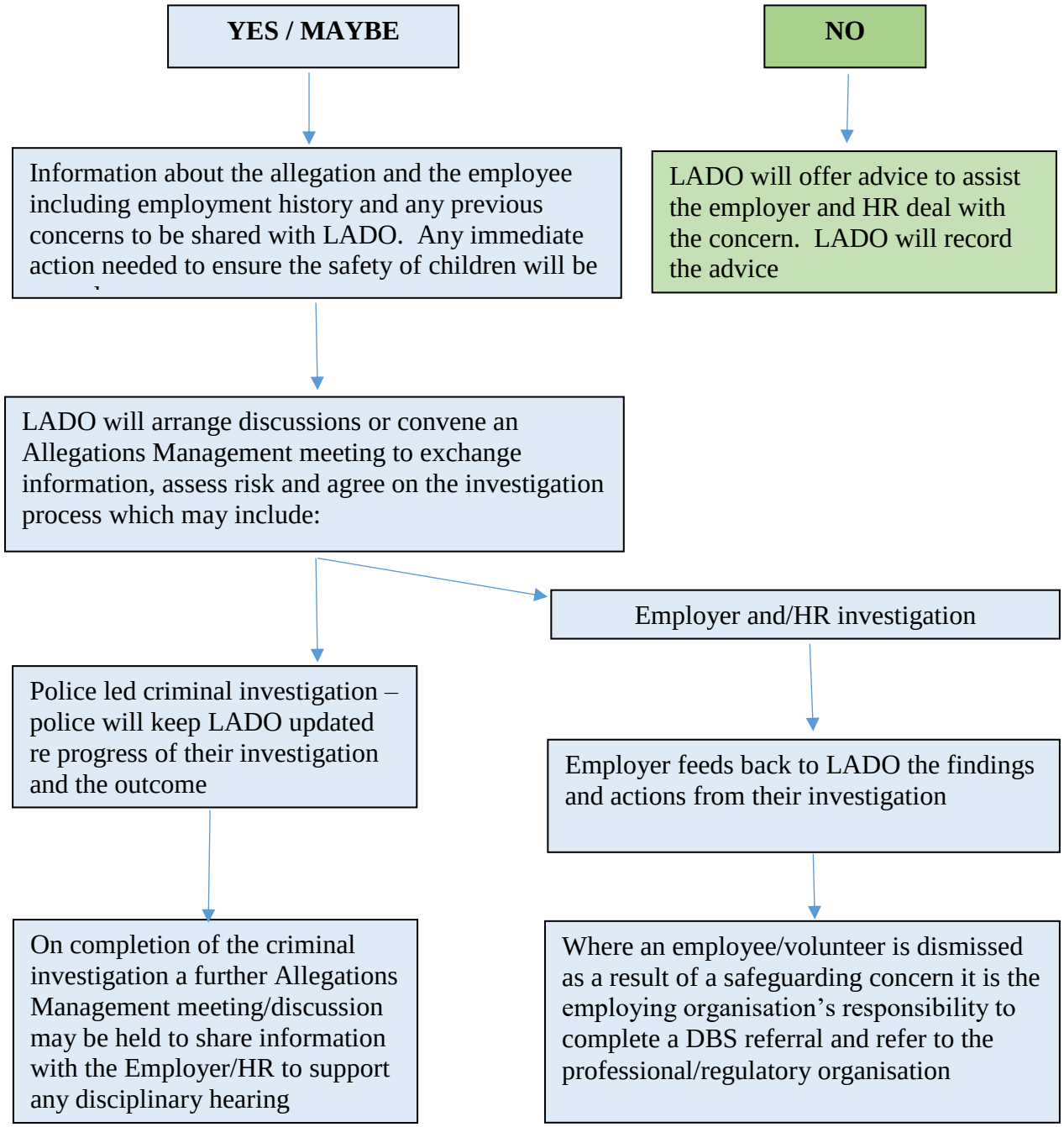
Appendix A Reporting of a concern flowchart



Appendix B Disclosure and Barring Service Criminal Record and Barring Checks



Appendix C LADO Process flowchart

LADO THRESHOLD (Working Together to Safeguard Children 2023 & KCSIE 2025)

- Behaved in a way that has harmed/may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children (Working Together to Safeguard Children 2023)
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children