



FOREST OF DEAN COMMUNITY SCHOOLS FEDERATION

PARKEND PRIMARY & YORKLEY PRIMARY

Safeguarding and Child Protection Policy

2026 - 2027

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Contents

[Statement of intent](#)

[Acronyms](#)

[Definitions](#)

1. [Legal framework](#)
2. [Roles and responsibilities](#)
3. [Multi-agency working](#)
4. [Family Help](#)
5. [Abuse, neglect and exploitation](#)
6. [Specific safeguarding issues](#)
7. [Child-on-child abuse](#)
8. [Online safety and personal electronic devices](#)
9. [Making or sharing of nudes and semi-nudes](#)
10. [Context of safeguarding incidents](#)
11. [Pupils potentially at greater risk of harm](#)
12. [Use of the school premises for non-school activities](#)
13. [Alternative provision](#)
14. [Private Fostering](#)
15. [Concerns about pupils](#)
16. [Managing referrals](#)
17. [Concerns about school safeguarding practices](#)
18. [Safeguarding concerns and allegations of abuse against staff](#)
19. [Communication and confidentiality](#)
20. [Safer recruitment](#)
21. [Single central record \(SCR\)](#)
22. [Training](#)
23. [Monitoring and review](#)
24. [Links to other policies](#)

Appendices

- A. [Specific safeguarding issues](#)

Statement of Intent

The Forest of Dean Community Schools Federation is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

Our Safeguarding Ethos:

The Forest of Dean Community Schools Federation recognises the importance of providing an ethos and environment that deters and prevents abuse and challenges inappropriate behaviour, ensuring children are safe, secure and respected; encouraging them to talk openly; whilst, enabling them to feel confident that they will be listened to. The Federation recognises that safeguarding and promoting the welfare of children is everyone's responsibility. All staff should maintain a child-centred approach and consider, at all times, what is in the best interests of the child.

The Federation recognises that safeguarding risks may occur both online and offline and that abuse, neglect, exploitation, child-on-child abuse, harmful sexual behaviour, serious violence and mental health concerns can overlap. Early identification, information sharing and timely intervention are essential in protecting children and promoting their welfare.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing body, the Executive Headteacher, staff and volunteers understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know how to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil who has been subject to, or is at risk of, abuse, neglect, exploitation, serious violence, harmful sexual behaviour, child-on-child abuse, online harm or radicalisation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Executive Headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Working collaboratively with families, Family Help services, Children's Social Care, safeguarding partners and other agencies to ensure children receive the right support at the right time.

Across our Federation, we have two DSL's and six separate DDSL's.

Details of our DSL's and Deputy DSL's are available in each classroom, on the safeguarding displays around the school, on both school websites and for Yorkley, also on the notice board in the main reception area.

Designated Safeguarding Lead - Parkend School: Mrs T Wood

(Deputy Executive Head Teacher) 01594 562407

tracy.wood@yorkley.gloucs.sch.uk

Deputy Safeguarding Leads: Mrs K Burke (Executive Headteacher)

Mrs J James (Family Support Worker)

Mrs H Wright (Teacher and SENDCo)

Mr J Newman (Teacher)

Mrs N Smith (Teacher)

Designated Safeguarding Lead Yorkley School: Mrs K Burke

(Executive Head Teacher) 01594 562206

head@yorkley.gloucs.sch.uk

Deputy Safeguarding Leads: Mrs T Wood (Deputy Executive Head)

Mrs J James (Family Support Worker)

Mrs H Wright (Teacher and SENDCo)

Mrs G Lewis (Teacher)

Mrs E Smith (Teacher)

Safeguarding Governors Team:

Sophie Thorne & Jon Meager

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
DUAA	Data (Use and Access) Act 2025	Legislation which works alongside the Data Protection Act 2018 and UK GDPR to govern how personal information is processed, stored and shared.

EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of personal data and ensure that procedures relating to the collection, processing, retention and sharing of personal information are lawful, fair and transparent. In safeguarding documentation this should be read alongside the Data Protection Act 2018 and the Data (Use and Access) Act 2025
HFBA	'Honour or Faith-based' abuse	Honour or faith-based abuse involves incidents or crimes committed to protect or defend the perceived honour, beliefs, values, culture or faith of a family, community or group. This may include practices such as forced marriage and female genital mutilation.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.

LACS	Local Authority Children's Services	The branch of the local authority that deals with children's social care. (Gloucestershire County Council)
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.

VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.
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Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and promoting the welfare of children**” is defined as:

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

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to sexual activity if they agree by choice and have the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated and create a

hostile, offensive or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual making or sharing of nudes and semi-nudes, including images generated or manipulated using artificial intelligence (AI).
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion and threats.
 - Abusive, harassing, misogynistic or misandrist online messages.

For the purposes of this policy, **"upskirting"** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, **"making or sharing nudes and semi-nudes"** refers to the creation, sending, sharing or posting of nude or semi-nude images by children under the age of 18. The term "images" includes photographs, videos, livestreams and other visual content.

Images may be self-generated, created by another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or so-called "deep nudes".

For the purposes of this policy, **"indecent imagery"** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing.
- A child touching themselves in a sexual way.

- Any sexual activity involving a child.
- Someone hurting a child sexually.
- Sexual activity that involves animals.

For the purposes of this policy, “**abuse**” is defined as 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 the ill-treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, including via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or by another child or children. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.

For the purposes of this policy, “**physical abuse**” is defined as 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 abuse can also occur when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, “**emotional abuse**” is defined as 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, unloved, inadequate or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling or name-calling, as well as 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 beyond a child's developmental capability, overprotection, limitation of exploration and learning, or preventing participation in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all forms of maltreatment, although it may occur alone.

For the purposes of this policy, “**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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside 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 be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child

from physical or emotional harm or danger, ensure adequate supervision (including the use of inadequate caregivers), or ensure access to appropriate medical care or treatment. Neglect may also include unresponsiveness to a child's basic emotional needs.

1. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The School Premises (England) Regulations 2012
- Education (Independent School Standards) Regulations 2014
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Children's Wellbeing and Schools Act 2026

Statutory Guidance

- DfE (2026) Keeping Children Safe in Education 2026
- DfE (2026) Working Together to Safeguard Children
- DfE (2015) The Prevent Duty
- DfE (2018) Disqualification under the Childcare Act 2006
- DfE (2026) Relationships Education, Relationships and Sex Education (RSE) and Health Education
- HM Government (2020) Multi-agency Statutory Guidance on Female Genital Mutilation
- HM Government (2021) Channel Duty Guidance: Protecting People Vulnerable to Being Drawn into Terrorism
- Home Office and Foreign, Commonwealth and Development Office (2023) Multi-agency Statutory Guidance for Dealing with Forced Marriage and Multi-agency Practice Guidelines: Handling Cases of Forced Marriage
- Early Years Foundation Stage Statutory Framework (where applicable to nursery and reception-aged children)

Non-Statutory Guidance

- DfE (2015) What to do if you're worried a child is being abused
- DfE (2017) Child Sexual Exploitation: Definition and Guide for Practitioners
- DfE (2018) Information Sharing: Advice for Practitioners Providing Safeguarding Services
- DfE (2020) Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People
- DfE (2021) Teachers' Standards
- DfE (2022) Recruit Teachers from Overseas
- DfE (2026) Working Together to Improve School Attendance
- DfE (2026) Meeting Digital and Technology Standards in Schools and Colleges
- DfE (2026) Filtering and Monitoring Standards for Schools and Colleges
- DfE (2026) Teaching Online Safety in Schools
- DfE (2026) Mobile Phones in Schools
- DfE (2026) Generative Artificial Intelligence (AI) in Education
- Department of Health and Social Care (2022) Virginity Testing and Hymenoplasty: Multi-agency Guidance
- Information Commissioner's Office (ICO) Guide to Sharing Information to Safeguard Children and Young People in the Education Sector

2. Roles and Responsibilities

All staff have a responsibility to:

- Read and understand at least Part One of Keeping Children Safe in Education 2026. Staff who work directly with children should also read Annex A: Further Information.
- Consider, at all times, what is in the best interests of the child.
- Maintain an attitude of "it could happen here" where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from Family Help.
- Be aware of the school's systems which support safeguarding, including policies, procedures, staff training and safeguarding reporting systems.
- Be aware of the role and identity of the DSL and Deputy DSLs across the Federation.
- Undertake safeguarding and child protection training, including online safety training, during induction and receive regular updates thereafter. This includes an understanding of filtering and monitoring responsibilities.
- Receive safeguarding and child protection updates, including online safety updates, as required and at least annually.
- Be aware of local Family Help processes and understand their role within these arrangements.
- Understand the process for making referrals to Children's Social Care and other agencies where appropriate.
- Know what to do if a child discloses abuse, neglect or exploitation.

- Be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality and only share information with those who need to know.
- Reassure children that they will be taken seriously, supported and kept safe.
- Speak to the DSL or DDSL if they are unsure about any safeguarding matter.
- Be aware of safeguarding issues which may place pupils at risk of harm, both online and offline.
- Be aware of indicators of abuse, neglect, exploitation, mental health concerns, serious violence, harmful sexual behaviour and child-on-child abuse.
- Understand that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator.
- Report concerns promptly and never assume another colleague will take action.

Teachers, including the Executive Headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the Teachers' Standards.
- Personally report to the police any known cases where it appears that an act of FGM has been carried out on a girl under the age of 18, as soon as possible and in accordance with statutory requirements.

The Governing Body has a duty to:

- Read and understand their responsibilities under Keeping Children Safe in Education 2026. Governors should read Part Two as a minimum and understand their safeguarding responsibilities across all sections of the guidance. The safeguarding governor should read the guidance in full.
- Take strategic leadership responsibility for the Federation's safeguarding arrangements.
- Ensure the Federation complies with child protection and safeguarding legislation and statutory guidance.
- Ensure safeguarding policies, procedures and training are effective and legally compliant.
- Appoint a suitably qualified and experienced DSL with sufficient status, authority, time, funding, training, resources, skills and experience to fulfil the role effectively.
- Ensure robust arrangements are in place to provide safeguarding cover where the DSL is unavailable.
- Have strategic oversight of online safety, filtering and monitoring systems and ensure annual reviews of effectiveness are undertaken and recorded.
- Ensure safeguarding arrangements are in place where facilities or premises are hired or rented to external organisations.
- Seek assurance that organisations using school premises have appropriate safeguarding and child protection arrangements and that adults working with children have undergone appropriate vetting checks.

- Ensure safeguarding requirements are included within lease, hire or transfer agreements.
- Ensure safeguarding arrangements support children who are absent from education.
- Ensure appropriate safeguarding training is provided for governors and regularly updated.
- Establish robust health and safety and emergency evacuation procedures.

The Executive Headteacher has a duty to:

- Ensure safeguarding and child protection policies and procedures adopted by the Governing Body are fully implemented.
- Ensure all staff receive appropriate safeguarding information, policies and training on induction.
- Promote a strong safeguarding culture throughout the Federation.
- Ensure that filtering and monitoring systems are appropriately implemented, regularly reviewed and effective.
- Ensure safer recruitment practices are consistently followed.
- Ensure all required suitability and pre-employment checks are completed for staff, volunteers, trainees, contractors, governors and members.
- Ensure concerns about staff, volunteers, trainee teachers, contractors and supply staff are managed in accordance with statutory guidance.
- Ensure referrals are made to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) and other relevant bodies where required.

The Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs) have a duty to:

- Carry out their responsibilities in accordance with Annex B of Keeping Children Safe in Education 2026.
- Take lead responsibility for safeguarding and child protection across the Federation.
- Act as a source of safeguarding advice, expertise and support.
- Manage referrals, information sharing and safeguarding records.
- Work effectively with Children's Social Care, safeguarding partners and other relevant agencies.
- Ensure child protection files are maintained appropriately and transferred securely when pupils move schools.
- Promote an awareness of safeguarding throughout the Federation.
- Support staff in identifying safeguarding concerns and implementing effective safeguarding practice.
- Ensure safeguarding training and updates are delivered appropriately.
- Maintain an up-to-date understanding of safeguarding developments, local procedures and national guidance.

The Designated Teacher has responsibility for:

Promoting the educational achievement of Looked After Children (LAC), Previously Looked After Children (PLAC), children who have left care through adoption, special guardianship or child arrangement orders, and children adopted from state care outside England and Wales.

The Member of Staff responsible for Looked after Children (LAC):

Mrs H Wright

Mrs Wright is also the Federation SENDCo

hwright@parkend.gloucs.sch.uk

hwright@yorkley.gloucs.sch.uk

3. Multi-agency Working

The Federation contributes to multi-agency working as part of its statutory safeguarding duties and is aware of, and will follow, local safeguarding arrangements.

The Federation will be fully engaged, involved and included in local safeguarding arrangements. Where the Federation is named as a relevant agency by safeguarding partners, it will fulfil its statutory duty to cooperate with published arrangements and act in accordance with those safeguarding arrangements.

The Federation will work with Local Authority Children's Services, the Police, Health Services, safeguarding partners and other relevant agencies to safeguard and promote the welfare of children. This includes contributing to Family Help assessments, child protection processes and multi-agency plans that provide support for children and families.

Where a need for Family Help is identified, the Federation will allow access from the host Local Authority and, where appropriate, a placing Local Authority, for that authority to conduct, or consider whether to conduct, a Section 17 (Child in Need) or Section 47 (Child Protection) assessment.

The Federation recognises the importance of effective multi-agency collaboration in identifying and responding to abuse, neglect, exploitation, child criminal exploitation (CCE), child sexual exploitation (CSE), serious violence, radicalisation and other safeguarding concerns.

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for Family Help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection

regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

4. Family Help

Family Help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from Family Help; however, staff will be particularly alert to the potential need for additional support for pupils who:

- Are disabled or have certain health conditions and specific additional needs.
- Have SEND, whether or not they have a statutory Education, Health and Care (EHC) Plan.
- Have mental health needs.
- Are young carers.
- Are pregnant and/or a parent themselves.
- Have exhibited early signs of abusive, violent and/or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement, organised crime groups or county lines.
- Are frequently missing or go missing from education, home or care.
- Have been repeatedly removed from the classroom, experienced multiple suspensions, are on a part-time timetable, are at risk of permanent exclusion, or are educated in alternative provision.
- Are at risk of exploitation, modern slavery, trafficking, criminal exploitation or sexual exploitation.
- Are at risk of being radicalised into terrorism.
- Have a parent or carer in custody, or are affected by parental offending.
- Are living in family circumstances presenting challenges, including substance misuse, adult mental health issues or domestic abuse.
- Misuse alcohol or drugs themselves.
- Have returned home to their family from care.
- Are at risk of honour or faith-based abuse, including Female Genital Mutilation (FGM) or forced marriage.
- Are privately fostered.
- Show early signs of abuse, neglect or exploitation.
- Are experiencing persistent absence, absenteeism or other barriers to full participation in education.

The Federation recognises that Family Help includes community-based Family Help, targeted early help services and statutory support provided under Sections 17 and 47 of the Children Act 1989. Staff will be aware of local pathways for support and referral.

The DSL, DDSL, SENDCo or Family Support Worker will take the lead where Family Help is appropriate. This may include liaising with external agencies, supporting Family Help

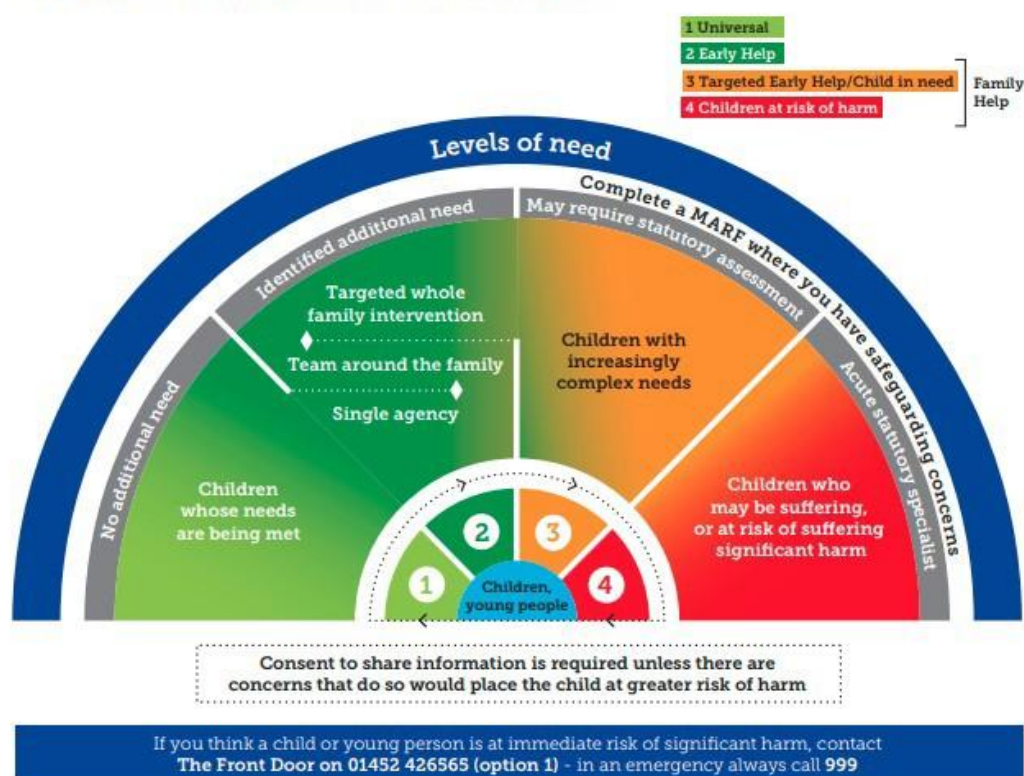
assessments and coordinating multi-agency support. The local Family Help process will be followed where required.

All staff should consider whether there is any offer of Family Help that could support a child and family to improve outcomes and reduce the likelihood of concerns escalating. Early identification and intervention remain key principles of effective safeguarding.

The Federation utilises Gloucestershire's Continuum of Need ("The Windscreen") to support professional decision-making and to help identify the most appropriate level of support for children and families.

The Windscreen

A diagram to demonstrate the Continuum of Need



The [GSCP levels of intervention guidance](#) is intended to provide practitioners with guidance about making decisions according to the level of need. It aims to make sure that the appropriate level of support will be put in place to ensure that a child or young person's needs are met in a robust and timely way.

Levels of intervention act as a guide to professional decision making and are there to make sure that children, young people and families are able to access the right support to increase life chances and keep children and young people safe.

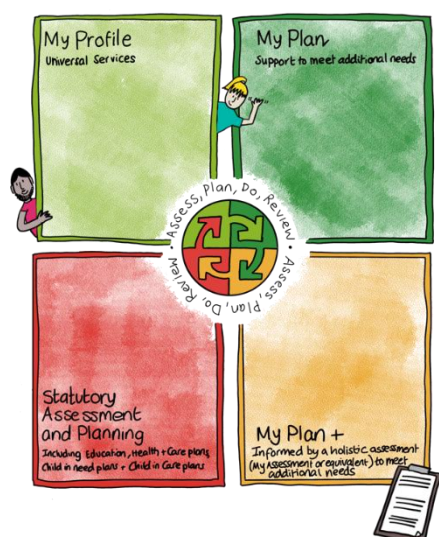
Children and families have different levels of need at different times across a range of problems. Having a graduated approach ensures that support will be proportionate and at the lowest level of intervention.

Children might also have a range of needs across different levels. It is important to take all needs into consideration when determining the type of support that might be required and the professionals who should be involved.

The levels of intervention windscreen works alongside the Graduated Pathway.

Graduated Pathway

Children and families with additional needs may require support from a single agency, such as school or health services, or a coordinated response from a range of agencies working together.



Gloucestershire's Graduated Pathway provides a framework for identifying and responding to children's needs at the earliest opportunity. A **My Plan** may be used where needs are clearly identified and appropriate support can be coordinated by a single practitioner or service. Where needs are more complex, unclear, escalating, or require a coordinated multi-agency response, a **My Assessment** and **My Plan+** may be required.

Both **My Plan** and **My Assessment/My Plan+** should be coordinated by an identified Lead Practitioner, who will work collaboratively with the child, family and involved professionals to ensure that support is effective and outcomes are regularly reviewed.

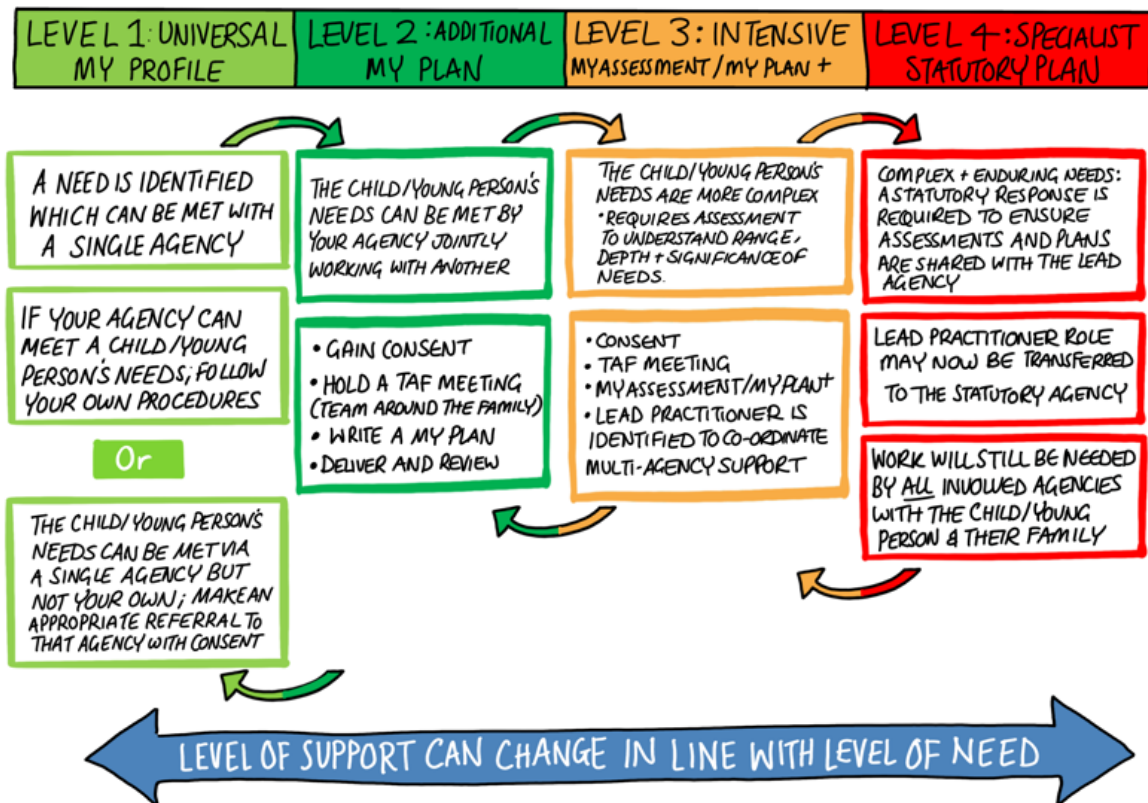
Children and young people's needs may change over time and it is important that transitions between levels of support are seamless. Information should be shared appropriately between agencies and the identified Lead Practitioner should be clear about their role and responsibilities. Children, young people and their families should be kept informed and actively involved in decision-making, planning and review processes.

The Federation is committed to working within Gloucestershire's Graduated Pathway and local Family Help arrangements to ensure that children and families receive the right support at the right time.

Further information is available from the Gloucestershire Family Information Directory:

<https://www.glosfamiliesdirectory.org.uk/>





5. Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect, exploitation and modern slavery and understand that children can be at risk of harm inside and outside of the school, inside and outside of the home, and online. Staff will exercise professional curiosity and remain alert to signs that a child may require help or protection.

The Federation recognises that abuse or neglect of a child may occur through the infliction of harm or through a failure to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. Children may be abused by adults or by other children and abuse may occur in person, online, or through a combination of both.

The Federation recognises the impact of domestic abuse on children and understands that children can be victims in their own right through seeing, hearing or experiencing the effects of domestic abuse within the home or within their own intimate relationships. All necessary steps will be taken to identify, assess and respond to such concerns.

All staff will be aware that abuse, neglect, exploitation and safeguarding concerns are rarely standalone events and that multiple issues frequently overlap. Staff will be vigilant in identifying patterns of concern and will always raise concerns with the DSL or DDSL.

All staff, particularly the DSL and DDSLs, will understand that safeguarding incidents and behaviours can be associated with factors outside the school and may occur between children

beyond the school environment. This includes recognising the risks posed by extra-familial harms such as child criminal exploitation, child sexual exploitation, serious violence, county lines activity, teenage relationship abuse, radicalisation and harmful sexual behaviour.

All staff will understand that technology is a significant component in many safeguarding and wellbeing concerns. Children may experience abuse, exploitation or harm online as well as face-to-face, and in many cases these risks occur concurrently. Staff will remain alert to risks associated with online abuse, cyberbullying, harmful online content, artificial intelligence (AI), the making or sharing of nudes and semi-nudes, exploitation and online harassment.

All staff will be aware of the appropriate action to take where a child is identified as being at risk of abuse, neglect or exploitation. If staff are unsure about any safeguarding concern, they will seek advice from the DSL or DDSL without delay.

6. Specific Safeguarding Issues

There are a number of specific safeguarding issues that can place children at risk of harm. All staff will be aware of these issues and understand that safeguarding concerns can arise both online and offline.

[Appendix A](#) of this policy sets out details of specific safeguarding issues that children may experience and outlines the Federation's approach to identifying, responding to and managing safeguarding concerns. This includes, but is not limited to, abuse, neglect, exploitation, child-on-child abuse, online safety, serious violence, child criminal exploitation, child sexual exploitation, mental health concerns, radicalisation, honour or faith-based abuse and other emerging safeguarding risks.

7. Child-on-child Abuse

For the purposes of this policy, **“child-on-child abuse”** is defined as abuse between children.

The Federation has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between children of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it and how to respond to reports. All staff will recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL or DDSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse being dismissed as banter, part of growing up, or boys being boys.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.

- Abuse in intimate personal relationships between peers, sometimes known as teenage relationship abuse.
- Physical abuse, including an online element which facilitates, threatens and/or encourages physical abuse.
- Serious violence and serious physical assault.
- Sexual violence, including an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment.
- Misogynistic, misandrist or sexist behaviour.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual making or sharing of nudes and semi-nudes, including AI-generated images.
- Upskirting.
- Initiation and hazing-type violence and rituals, including activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

The Federation recognises that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator and appropriate support will be considered for all children involved.

Some children may be particularly vulnerable and have an increased risk of abuse. The Federation recognises that children with SEND or certain health conditions are more likely to experience child-on-child abuse and may face additional safeguarding challenges. The school will consider additional support for these children where appropriate.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The Federation will give special consideration to children who:

- Have SEND.
- Are vulnerable to bullying.
- Are looked after or previously looked after.
- Are living in challenging or unsupportive home situations.

All staff will be clear as to the Federation's procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes reporting concerns about friends or peers. Pupils will be reassured that they will be taken seriously, supported and kept safe.

8. Online Safety and Personal Electronic Devices

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.
- Their responsibilities relating to filtering and monitoring systems.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- **Content** - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, conspiracy theories and violent content.
- **Contact** - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial or other purposes.
- **Conduct** - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, receiving or sharing explicit images, including the making or sharing of nudes and semi-nudes, sharing other explicit material, online bullying and online harassment.
- **Commerce** - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts and other types of financial scams. Any concerns that pupils or staff may be at risk will be reported through appropriate safeguarding channels.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Online Safety Policy. The appropriateness of the school's filters and monitoring systems will be informed by the Filtering and Monitoring Standards, the Cyber Security Standards for Schools and Colleges, and the risk assessment required by the Prevent Duty. The school will ensure that the use of filtering and monitoring systems does not cause over-blocking, which may lead to unreasonable restrictions on what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

- **Communicating with Parents**

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents about the systems used by the school to filter and monitor internet use. Every year parents will be invited to an online safety event or assembly. Both school websites will also signpost parents to supportive materials and guidance.

- **Personal Electronic Devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school in accordance with the Federation's Acceptable Use Agreements and Online Safety Policy.

Photographs and videos of pupils will be carefully planned before any activity, with particular regard to consent and compliance with the school's Data Protection Policy.

Where photographs and videos involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the Executive Headteacher will liaise with relevant staff to determine appropriate arrangements. The DSL or DDSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupil's social worker, carer or adoptive parent to assess any associated risks.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

- **Upskirting**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing activation by another person without that person's knowledge, for example a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will determine appropriate next steps, including referral to the police where necessary.

9. Consensual and Non-consensual Sharing of Indecent Images and Videos

The school will ensure that staff treat the consensual and non-consensual making or sharing of nudes and semi-nudes (previously referred to as "sexting" or youth-produced sexual imagery) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil and sexual behaviour that is inappropriate or harmful.

Staff will receive appropriate training on how to respond to incidents involving nudes and semi-nudes, including understanding motivations, assessing risks posed to pupils depicted in

images, including AI-generated images, and knowing how and when concerns should be reported.

Staff will be aware that creating, possessing and distributing indecent images of children is a criminal offence; however, pupils will not be unnecessarily criminalised.

Where a member of staff becomes aware of an incident involving nudes and/or semi-nudes, they will refer this to the DSL or DDSL as soon as possible.

10. Context of Safeguarding Incidents

Safeguarding incidents and behaviours can be associated with factors outside of school and can occur between children outside of school. All staff, particularly the DSL and DDSLs, will consider the context within which safeguarding incidents occur.

All staff will understand that children may be vulnerable to abuse, exploitation or harm from outside their families. This is known as extra-familial harm and can include child criminal exploitation, child sexual exploitation, serious violence and abuse in the community.

Assessment of a pupil's behaviour and welfare will consider whether there are wider environmental factors that are threatening their safety or welfare. The school will provide as much contextual information as possible when making referrals to Children's Social Care and other agencies.

The school recognises that a child's experiences, friendships, peer groups, online activity, community and wider environment may all be relevant when assessing safeguarding concerns.

11. Pupils Potentially at Greater Risk of Harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when identifying abuse, neglect and exploitation in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need a Social Worker

Some pupils may need a Social Worker due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL and DDSLs will hold and use information from the local authority about whether a pupil has a Social Worker in order to make decisions in the best interests of the pupil's safety, welfare and educational outcomes.

Where a pupil has or has had a Social Worker, this will inform decisions about safeguarding, attendance, behaviour and the provision of pastoral and academic support.

Home-Educated Children

Parents may choose Elective Home Education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will inform the local authority of all deletions from the admissions register when a pupil is removed from roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the local authority and other relevant professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a Social Worker.

Looked After Children (LAC) and Previously Looked After Children (PLAC)

Children most commonly become looked after because of abuse and/or neglect. As a result, they can be at greater risk of safeguarding concerns. Previously looked after children may also remain vulnerable after leaving care.

The Governing Body will ensure that staff have the skills, knowledge and understanding necessary to keep LAC and PLAC safe. This includes ensuring that appropriate staff have access to information regarding:

- The child's legal status.
- Contact arrangements with parents and those with parental responsibility.
- Care arrangements and delegated authority for carers.

The DSL, DDSL and Designated Teacher will be provided with the details of pupils' Social Workers and Virtual School Heads and, where applicable, personal advisers.

Further details are outlined in the school's Looked After Children Policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware that:

- Additional barriers can exist when recognising abuse and neglect.
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to a pupil's disability without further exploration; however, it should never be assumed this is the case.
- Pupils with SEND can be disproportionately affected by bullying, child-on-child abuse and other safeguarding concerns.
- Communication barriers may make it more difficult for pupils to disclose abuse.

When reporting concerns or making referrals for pupils with SEND, these factors will always be considered. The DSL or DDSL will liaise with the SENDCo, parents and external agencies where appropriate to ensure that pupils receive suitable support.

LGBTQ+ Pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm. However, staff will recognise that LGBTQ+ pupils can be targeted by others and may experience bullying, harassment or prejudice-based incidents.

Staff will also recognise that a child perceived by others to be LGBTQ+ may be just as vulnerable as a child who identifies as LGBTQ+.

The Federation will endeavour to reduce any barriers faced by these pupils and provide a safe environment in which concerns can be discussed.

Pupils Requiring Mental Health Support

All staff will be aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not assume that poor mental health is the cause of a safeguarding concern. Where concerns arise, they will be managed through appropriate safeguarding procedures, with support provided in line with the school's Mental Health and Wellbeing arrangements.

Where a pupil is experiencing mental health difficulties that are also safeguarding concerns, safeguarding procedures will always take priority.

12. Use of the School Premises for Non-school Activities

Where the Governing Body hires or rents out school facilities or premises to organisations or individuals, it will ensure that appropriate safeguarding arrangements are in place to keep children safe.

Where activities are provided under the direct supervision or management of school staff, the school's child protection arrangements will apply. Where activities are provided separately by another organisation, the Governing Body will seek assurance that appropriate safeguarding and child protection policies and procedures are in place, including safer recruitment and DBS arrangements where required.

Safeguarding requirements will be included in any lease or hire agreement as a condition of use of the premises. Failure to comply with these requirements may result in termination of the agreement.

Extracurricular Activities and Clubs

External organisations providing extracurricular activities and clubs on the school site will work collaboratively with the school to safeguard pupils and follow local safeguarding arrangements.

Staff and volunteers delivering activities will understand their safeguarding responsibilities and how to report concerns appropriately.

National Governing Bodies of Sport receiving funding from Sport England or UK Sport should meet the Standards for Safeguarding and Protecting Children in Sport.

13. Alternative Provision

The school remains responsible for a pupil's welfare and safeguarding while they attend alternative provision.

Before a placement begins, the school will obtain written confirmation that appropriate safeguarding arrangements are in place and that all required safer recruitment and vetting checks have been completed for relevant staff.

The school will maintain regular communication with the provider and monitor the pupil's attendance, welfare and progress.

Private Fostering

Where a child under the age of 16, or under 18 if disabled, is cared for by someone who is not a parent, close relative or person with parental responsibility for 28 days or more, this may constitute a private fostering arrangement.

Where the school becomes aware that a pupil is being privately fostered, the DSL will notify the local authority as soon as possible so that the appropriate checks can be undertaken.

14. Concerns about Pupils

If a member of staff has any concern about a pupil's welfare, or a pupil has disclosed a safeguarding concern about themselves or another child, they will act immediately by speaking to the DSL or DDSL.

Staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and may not recognise their experiences as harmful. This will not prevent staff from maintaining professional curiosity and sharing concerns with the DSL or DDSL.

All staff are aware of the procedures for reporting concerns and understand their responsibilities regarding confidentiality, information sharing and record keeping.

Where a referral is made to Children's Social Care, the DSL or DDSL will monitor the outcome and, where necessary, challenge decisions or request reconsideration if concerns remain.

Where Family Help is considered appropriate, the child's situation will be kept under review. If concerns escalate or the child's circumstances do not improve, a referral to Children's Social Care will be considered.

All concerns, discussions, decisions and reasons for decisions will be recorded in writing using the school's safeguarding recording system.

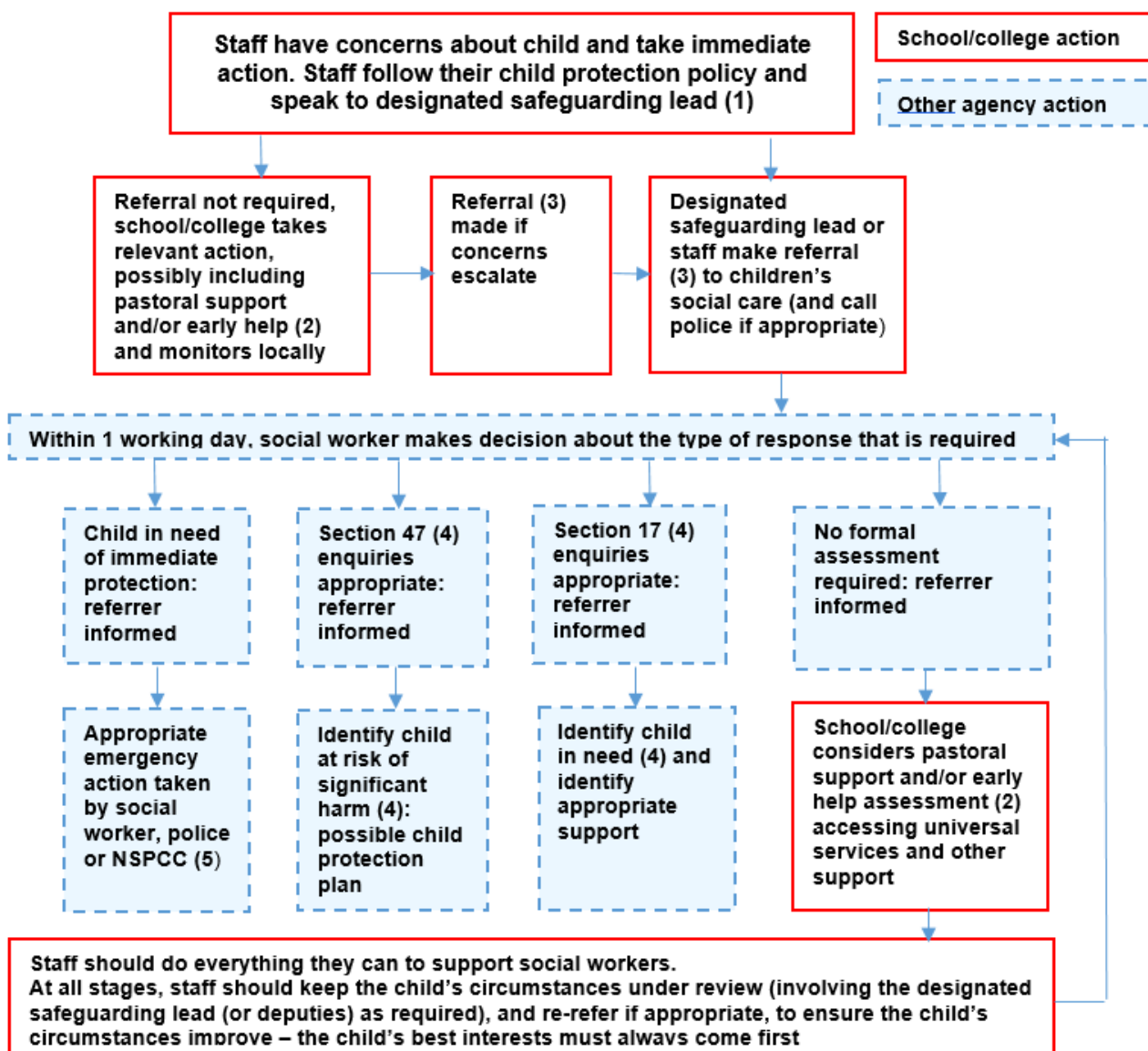
If a child is in immediate danger or at risk of significant harm, a referral will be made immediately to Children's Social Care and/or the Police.

Where there are safeguarding concerns, the school will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

An inter-agency assessment may be undertaken where a child and family would benefit from coordinated support from more than one agency. Such assessments will help identify what support is required to improve outcomes and prevent needs from escalating.

Concerns about a child

Actions where there are concerns about a child



Childs Name:

Details of Concern:
(Childs voice/observation)

Action Taken:
(What did you do following the incident/disclosure/concern?)

Signed _____ Job title _____

Print Name: _____

Form given to which DSL? _____

- **Record on the appropriate red form exactly what the child has said to you and include;**
 - Child's name,
 - Date and time of any incident
 - Childs voice
 - Action taken
 - Your observations e.g. child's behaviour and emotional state
 - Sign and date the record and pass straight onto the DSL / DDSL who will scan it onto My Concern and make a threshold decision.
- **Be clear about what the child says and what you say.**
 - Do not interview the child and keep questions to a minimum.
 - Encourage the child to talk but do not ask "leading questions" or press for information. Use 'Tell Me, Explain to me, Describe to me' (TED) questioning.
 - Remembering to use recognise, reassure, record, report, respond and refer. (Edited this to match display materials)

All classrooms have red forms in them readily available.

15. Managing Referrals

The school will follow the reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart.

All staff members, particularly the DSL and DDSLs, will be aware of local arrangements for managing referrals. The DSL will provide support and guidance to staff where required. When making referrals to Children's Social Care or other agencies, information will be shared appropriately and in line with safeguarding and data protection requirements.

The DSL or DDSL will work with external agencies and maintain effective communication to ensure that children receive appropriate support and protection. This includes participating in multi-agency working where required.

Where a referral has been made, Children's Social Care should acknowledge receipt and provide a response regarding the next steps within one working day. If this does not occur, the DSL or DDSL will follow up the referral and, where necessary, escalate concerns.

The school will not wait for the outcome of an investigation before taking action to safeguard a child. This applies to both criminal investigations and Children's Social Care enquiries.

Where Children's Social Care decide that statutory intervention is not required, the school will continue to consider what support may be needed, including Family Help, pastoral support or further referral if concerns remain.

At all stages of the referral process, the child's wishes and feelings will be considered. Discussions with parents or carers will take place where appropriate; however, this will not occur where doing so may place the child or another person at increased risk of harm.

All decisions, actions taken and outcomes will be recorded on the school's safeguarding recording system.

16. Concerns about School Safeguarding Practices

Any concerns regarding safeguarding practice within the Federation should be raised with the Executive Headteacher. The Federation's Whistleblowing Policy should be followed where a member of staff has concerns about poor or unsafe safeguarding practice.

Where a member of staff feels unable to raise concerns with the Executive Headteacher, or where the concern relates to the Executive Headteacher, concerns should be raised with the Chair of Governors via:

- chair@yorkley.gloucs.sch.uk
- chair@parkend.gloucs.sch.uk

Staff may also access external whistleblowing channels, including the NSPCC Whistleblowing Advice Line on **0800 028 0285**.

No member of staff will suffer a detriment for raising genuine safeguarding concerns in good faith. All concerns will be taken seriously and addressed appropriately.

Staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Federation's **Allegations of Abuse Against Staff Policy**, a copy of which will be made available to and understood by all staff.

The Federation will ensure that all allegations against adults working in or on behalf of the school are dealt with appropriately and that relevant agencies are consulted where required.

When managing allegations against staff, the Federation will recognise the distinction between allegations that meet the **harms threshold** and allegations that do not meet the harms threshold, commonly referred to as **low-level concerns**.

Allegations that meet the harms threshold include instances where an adult working in or on behalf of the school 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 they may 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.

Low-level concerns are concerns, no matter how small, that an adult working in or on behalf of the Federation may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the harms threshold.

Low-level concerns will be managed in accordance with the Federation's **Low-Level Concerns Policy** and Staff Code of Conduct.

17. Communication and Confidentiality

All child protection and safeguarding concerns will be treated with appropriate confidentiality and in accordance with the school's Data Protection Policy and information sharing procedures.

Where there is an allegation or incident of sexual violence or sexual harassment, the school will carefully consider information sharing and will work to protect the privacy of all children involved. Information will only be shared on a need-to-know basis and in line with legal requirements.

Concerns will only be shared with those who need the information in order to safeguard and support the child. During a disclosure, staff will not promise confidentiality and will explain that information may need to be shared with appropriate people in order to keep the child safe.

Where it is necessary to safeguard a child or protect others from harm, information may be shared without consent where lawful and appropriate to do so. When making such decisions, the DSL will balance the wishes of the child against the duty to protect them and others from harm.

Depending on the nature of the concern, the DSL or DDSL will discuss concerns with parents or carers where appropriate. Discussions with parents will not take place where doing so could place a child at increased risk of harm or compromise an investigation.

Where confidentiality has been breached, the school will take appropriate action and consider what steps are required to minimise any impact and prevent future occurrences.

When a pupil moves school, the DSL or DDSL will ensure that relevant safeguarding information, including child protection records where applicable, is transferred securely to the receiving school as soon as possible and within five working days for an in-year transfer or within the first five working days of the start of a new term. Confirmation of receipt will be obtained from the receiving school.

18. Safer Recruitment

The Federation's full safer recruitment procedures are outlined in the Safer Recruitment Policy.

An enhanced DBS check, including barred list information where appropriate, will be undertaken for all staff engaged in regulated activity.

A person will be considered to be engaging in regulated activity if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school when children are present.
- Regularly have unsupervised contact with children.

The Federation will carry out all required pre-employment checks for prospective employees, including internal candidates, agency staff, trainee teachers, volunteers, contractors and individuals who have lived or worked outside the UK.

Appropriate vetting, identity, qualification, prohibition, right to work and DBS checks will be undertaken in line with statutory guidance and recorded on the Single Central Record.

• Staff Suitability

The Federation will ensure that staff working in relevant childcare settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.

A person may be disqualified if they:

- Have certain orders, restrictions or prohibitions placed upon them.
- Have committed certain offences.

Where required, staff will complete a Staff Disqualification Declaration. Any individual who is disqualified from working in relevant childcare provision will not undertake such work unless a waiver has been granted by Ofsted.

• Ongoing Suitability

The Federation recognises that safeguarding is an ongoing responsibility and will consider the continuing suitability of staff, volunteers and other adults working with children following their appointment.

Any concerns regarding suitability will be addressed promptly and in accordance with safeguarding, staff conduct and disciplinary procedures.

- **Referral to the DBS**

The Federation will make a referral to the Disclosure and Barring Service (DBS) where it is legally required to do so.

This includes circumstances where an individual has harmed a child, poses a risk of harm to a child, or has been removed from regulated activity (or would have been removed had they not resigned) because of safeguarding concerns.

The Federation will also make referrals to other relevant bodies, including the Teaching Regulation Agency (TRA), where required.

19. Single Central Record (SCR)

The Federation maintains a Single Central Record (SCR) in accordance with statutory requirements.

The SCR records all required pre-employment and safeguarding checks for:

- Staff.
- Agency and third-party supply staff.
- Teacher trainees.
- Governors.
- Volunteers where appropriate.
- Contractors where appropriate.

The SCR is regularly monitored and reviewed to ensure compliance with statutory guidance and safer recruitment requirements.

20. Training

All staff members will undergo safeguarding and child protection training as part of their induction. This training will be regularly updated and supplemented by safeguarding updates throughout the year and whenever there are changes in legislation, guidance or local procedures.

Induction training will include:

- The Child Protection and Safeguarding Policy.
- The Staff Code of Conduct.
- Part One of Keeping Children Safe in Education (and Annex A where appropriate).
- The Behaviour Policy.

- Safeguarding and child protection training, including online safety and filtering and monitoring responsibilities.
- Information about the role and identity of the DSL and DDSLs.

All staff will receive safeguarding and child protection updates as required and at least annually.

Training will include, where appropriate:

- Updates to Keeping Children Safe in Education.
- Local safeguarding arrangements and procedures.
- Contextual safeguarding and extra-familial harm.
- Child criminal exploitation (CCE) and child sexual exploitation (CSE).
- Online safety, including emerging technologies and AI-related risks.
- Prevent, FGM and radicalisation.
- Information sharing and record keeping.
- The importance of professional curiosity.

Staff will be given opportunities to contribute to and inform safeguarding arrangements within the Federation.

The DSL and DDSLs will undertake training to provide them with the knowledge and skills required to carry out their role. This training will be refreshed at least every two years, with continual updates undertaken as required.

DSL and DDSL training will include:

- Family Help and statutory safeguarding processes, including local referral arrangements.
- Child protection conferences, core groups and review processes.
- Working with Children's Social Care and other safeguarding partners.
- The impact of abuse, neglect, exploitation, adversity and trauma.
- The specific needs of children in need, pupils with SEND, pupils with medical conditions and young carers.
- Information sharing and multi-agency working.
- Prevent and safeguarding from radicalisation.
- Online safety, including filtering and monitoring.
- Child-on-child abuse, sexual violence and sexual harassment.

The Governing Body will ensure that governors receive safeguarding and child protection training appropriate to their role and responsibilities.

21. Monitoring and Review

This policy will be reviewed at least annually by the DSLs and DDSLs and approved by the Governing Body.

The policy will also be reviewed and updated whenever there are changes to legislation, statutory guidance, local safeguarding arrangements, or following any significant safeguarding incident, allegation or learning review.

Any changes to this policy will be communicated to all staff. All staff are expected to familiarise themselves with the contents of this policy and follow the procedures outlined within it.

Child protection incidents, safeguarding concerns and allegations against staff may be reviewed to identify any lessons learned and to improve safeguarding practice across the Federation.

Where safeguarding concerns are raised by external agencies, including the Local Authority Designated Officer (LADO), Ofsted or safeguarding partners, the Federation will:

- Undertake any required investigation promptly.
- Comply with agreed timescales.
- Report findings and actions to the appropriate body where required.
- Implement recommendations and actions as quickly as reasonably practicable.

The Governing Body will receive regular safeguarding information and assurance to enable it to fulfil its safeguarding responsibilities effectively.

22. Links to other Policies

- Allegations against Staff
- Anti-Bullying and Hate
- Appraisal Policy
- Attendance
- Behaviour, Rewards and Sanctions
- Complaints
- Conduct Policy
- Confidentiality
- Data Protection
- Educational Visits
- Escalation Policy
- Early Years Foundation Stage (EYFS)
- First Aid
- Health and Safety

- Intimate Care
- Lettings
- Looked After Children
- Low-Level Concerns
- Online Safety
- Personal, Social, Health and Citizenship Education
- Relationship, Health and Sex Education
- Safer Recruitment
- Special Educational Needs and Disabilities
- Staff Code of Conduct
- Supporting Pupils with Medical Conditions
- Suspensions and Exclusions
- Whistleblowing
- Young Carers

Multi-Agency Contacts for Safeguarding in Education.

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

If a child is at immediate risk call the POLICE	POLICE 999
If you have urgent safeguarding concerns for a child or young person, please call Gloucestershire MASH To make a referral to Gloucestershire MASH using the liquid logic portal Non- emergency	on 01452 426565 and select option 3. https://children.gloucestershire.gov.uk/web/portal/pages/home 101
Outside of office hours, you should contact the Emergency Duty Team (EDT) or, if you have concerns about the immediate safety of the child or you believe a serious criminal offence has been committed, please contact the Police at any time on 101	EMERGENCY DUTY TEAM – 01452 614194
Gloucestershire making a referral to prevent Gloucestershire prevent Information Useful Contacts	https://www.gov.uk/guidance/making-a-referral-to-prevent https://www.gloucestershire.gov.uk/your-community/emergencies-and-your-safety/gloucestershire-prevent/what-if-you-have-concerns-about-an-individual/ https://www.gloucestershire.gov.uk/your-community/emergencies-and-your-safety/gloucestershire-prevent/useful-contacts-police-prevent-team/#main
Family Help Practitioner Advice Line Access advice, guidance and support from an EHCO via the Advice Line Monday – Friday 9am - 4pm 01452 426644 Elizabeth Frisby - 07467354264	

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

To raise concerns and ask for guidance in relation to the conduct of someone who works with children.	1 Local Authority Designated Officer - (LADO) LADO (Local Authority Designated Officer) 01452 42 6994 amadmin@gloucestershire.gov.uk . Allegations Management Referral Form
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For further information and guidance on:

Child sexual exploitation & child criminal exploitation	https://www.gloucestershire.police.uk/police-forces/gloucestershire-constabulary/areas/gloucestershire/campaigns/campaigns/2021/child-criminal-exploitation/
23. Special Educational Needs and Disability (SEND) including Autism https://www.gloucestershire.gov.uk/education-and-learning/special-educational-needs-and-disability-send/	
Child Missing from Education guidance	https://www.gloucestershire.gov.uk/schoolsnet/your-pupils/children-missing-education/
Children affected by Forced Marriage	http://www.glostakeastand.com/types-of-abuse/forced-marriage/
Online Safety Advice Gloucestershire's Healthy Living and Learning	http://sites.southglos.gov.uk/safeguarding/children/i-am-a-parentcarer/keeping-children-safe-online/ Mon – Fri 01452 866000 Out of Hours 01452 615165 https://www.ghll.org.uk/resources/online-safety/
Information regarding online child abuse	https://www.gloucestershire.police.uk/advice/advice-and-information/caa/child-abuse/online-child-abuse/
FGM advice	https://www.gloucestershire.police.uk/advice/advice-and-information/caa/child-abuse/female-genital-mutilation-fgm/
Domestic Abuse support GDASS	https://www.gdass.org.uk/
Gloucestershire's Young Carers	http://www.glosyoungcarers.org.uk
Mental health Advice (Local) Child and Adolescent Mental Health professional advice line CAMHS Advice Line on 01452 894272 between 9am and 5pm Monday to Friday. Gloucestershire's Health and Care NHS Foundation Trust https://cayp.ghc.nhs.uk TIC+ http://www.ticplus.org.uk/ Yorkley The Forest of Dean Community Schools is proud to work in collaboration with Young Minds Matter Please speak to Mrs James or Mrs Wright for further guidance.	
Advice around harmful sexualised behaviour.	NSPCC https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour

Specific Safeguarding Issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence
17. Young Carers
18. Fabricated, Induced Illness and Abuse of Medication
19. Gangs and Youth Violence – Great Expectations

Domestic Abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

GLOUCESTERSHIRE ENCOMPASS COMMITMENT:

Operation Encompass helps police and schools work together to provide emotional and practical help to children (Annex B, Keeping Children Safe in Education 2026). As part of our federation to commitment to keeping children safe we have signed up to implement the principles and aims of the Gloucestershire Encompass Model.

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

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

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children Absent from Education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's [guidance](#) on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child Abduction and Community Safety Incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child Criminal Exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

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

County Lines

For the purposes of this policy, **“county lines”** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber - Crime

For the purposes of this policy, **“cyber-crime”** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

Child Sexual Exploitation (CSE)

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern Slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.

- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called “**‘honour or Faith based’ abuse (HFBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HFBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HFBA, including concerns that a child is at risk of HFBA, or has already suffered from HFBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity Testing and Hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, ‘2-finger’ or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HFBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands’ family to fulfil the requirement that a woman remains ‘pure’ before marriage. Those who ‘fail’ to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HFBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced Marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of

coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or Headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Radicalisation

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty will form part of the school’s wider safeguarding obligations.

The school’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Pupils with Family Members in Prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils Required to Give Evidence in Court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet ‘[Going to Court](#)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental Health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils’ experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school’s Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious Violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will be aware that the Police, Crime, Sentencing and Courts Act places a duty on specified authorities to share information and collaborate to prevent and reduce serious violence within local communities.

Young Carers

A Young Carer is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances.

The setting will support pupils who are young carers to appropriate support.

The Carers Support Centre can undertake an assessment of need and provide bespoke support.

Fabricated, Induced Illness and Abuse of Medication

There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- **fabrication** of signs and symptoms. This may include fabrication of past medical history;

- **fabrication** of signs and symptoms and **falsification** of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents;
- **induction** of illness by a variety of means.

Gangs and Youth Violence – Great Expectations

Great Expectations is a multi-agency working partnership to reduce crime and anti-social behaviour. This project supports young people on the periphery of crime; it involves the constabulary's Youth Engagement Officers, Gloucester City Homes, HM Prison Service, the Probation Service, the County Council's Families First programme and Social Care. Together they provide a programme of education, prevention and diversion to assist young people in making the right choices in life and so avoid a potential life of crime.

<https://www.gloucestershire.police.uk>

