

Child Protection & Safeguarding Policy

**(including Safer Recruitment,
Allegations Against Staff and Low-Level Concerns)**

Approved by:	Paul Thirkettle (Chair of Governors)	Date: September 2026
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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead & Prevent Lead (DSL)	Kelly Whiting	kelly.whiting@st-giles.croydon.sch.uk
Deputy DSL & Family Support Worker	Hazel Earl	hearl18.306@lgflmail.org
Local authority designated officer (LADO)	Jane Rowe	lado@croydon.gov.uk jane.rowe@croydon.gov.uk Tel 0208 726 6000 (Ext 84343) Mob 07716092630
MASH (Multi-Agency Safeguarding Hub)	-	Croydon MASH 020 8255 2888 (9-5 pm) 0208 726 6000 (5 pm-9 am) Emergency Duty Team 020 8726 6400 mash@croydon.gov.uk Emergency Services: 999 for immediate risk of harm
Croydon Safeguarding Children Partnership (CSCP)	-	Website: https://www.croydonsafeguarding.org Email: CSCP@croydon.gov.uk Tel: 0208 604 7275
Chair of Governors	Paul Thirkettle	pthirkettle.306@lgflmail.org
Nominated Governor for Safeguarding	Jill Manson	jmanson.gov@outlook.com
Channel helpline	Prevent Team Croydon London Prevent Team National Prevent Advice Line	channel@croydon.gov.uk 020 7340 7264 0800 011 3764

1. Statement of Intent

St Giles School 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.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities in relation to safeguarding and child protection.
- Staff are appropriately trained to recognise, respond to, record and report safeguarding concerns.
- Every pupil is provided with a safe, supportive and inclusive environment in which they can learn, develop and thrive.
- Pupils are protected from all forms of abuse, neglect, exploitation and harm, including online abuse.
- The wishes, feelings and best interests of the child are central to all safeguarding decisions.
- Children receive the right help at the right time through effective early identification and intervention.
- Effective systems are in place for recording, sharing and monitoring safeguarding concerns.
- The school works collaboratively with parents, carers, the Croydon Multi-Agency Safeguarding Hub (MASH), social care, health professionals, the police and other relevant agencies to protect children.
- All staff understand the additional vulnerabilities that may affect children and young people with special educational needs and disabilities (SEND), and take appropriate action to safeguard them.
- Safer recruitment practices are followed to help prevent unsuitable individuals from working with children.
- A culture of vigilance is maintained, where safeguarding is everyone's responsibility and concerns are acted upon promptly.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2026\)](#) and [Working together to safeguard children 2026](#) and the [Maintained schools: governance guide](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners and the Croydon Safeguarding Children Partnership (see section 3).

St Giles School works in accordance with the safeguarding procedures and local arrangements established by the Croydon Safeguarding Children Partnership (CSCP). Concerns about a child at risk of significant harm will be referred to the Croydon Multi-Agency Safeguarding Hub (MASH) in line with local procedures.

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

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- › [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse
- › The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- › This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- › The UK General Data Protection Regulation (UK GDPR)
- › Data Protection Act 2018
- › Data (Use and Access) Act 2025
- › The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- › Children's Wellbeing and Schools Act 2026

This policy should be read alongside the Special Educational Needs and Disability (SEND) Code of Practice: 0 to 25 years. St Giles School recognises that children with SEND can face additional safeguarding challenges, including communication barriers, assumptions that indicators of abuse relate to a child's disability, and increased vulnerability to abuse and neglect. Staff will remain vigilant to these additional risks and ensure that all pupils receive appropriate support and protection.

This policy is also has due regard to non-statutory guidance including, but not limited to, the following:

- › DfE 'What to do if you're worried a child is being abused'
- › DfE 'Child sexual exploitation'
- › DfE 'Filtering and monitoring standards for schools and colleges'
- › DfE 'Information sharing'
- › DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- › DfE 'Teachers' Standards'
- › DfE 'Recruit teachers from overseas'
- › DfE 'Meeting digital and technology standards in schools and colleges'
- › Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'
- › DfE 'Restrictive interventions, including the use of reasonable force, in schools'

This policy operates in conjunction with the following school policies and documents:

- › Attendance Policy
- › SEND Policy
- › Behaviour for communication Policy
- › Online Safety Policy
- › Data Protection Policy
- › Whistleblowing Policy
- › Safer Recruitment Policy
- › Staff Code of Conduct Policy
- › Allegations Against Staff Policy
- › Low-Level Concerns Policy
- › Health and Safety Policy
- › Medical Needs Policy
- › Allergy Policy
- › Safe use of AI policy
- › Staff Declaration Form

3. Definitions

Safeguarding and promoting the welfare of children means:

- › Providing help and support to meet the needs of children as soon as problems emerge
- › Protecting children from maltreatment whether that is within or outside the home, including online
- › Preventing impairment of children's mental and physical health or development

- › Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- › Taking action to enable all children to have the best outcomes

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

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

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

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

St Giles School recognises that children with Special Educational Needs and Disabilities (SEND) may face additional safeguarding challenges and barriers to communication. Staff should be particularly alert to indicators of abuse, neglect and exploitation and should not assume that behaviours, mood changes or injuries are related to a child's disability without further exploration.

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

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

Children with Special Educational Needs and Disabilities (SEND)

St Giles School recognises that many pupils have Severe Learning Difficulties (SLD), Profound and Multiple Learning Difficulties (PMLD), complex medical needs and significant communication needs. These pupils may face additional safeguarding challenges and may be more vulnerable to abuse, neglect, exploitation and bullying.

Some pupils may:

- Have limited verbal communication or use alternative communication systems.
- Rely on adults for personal care, intimate care, medical support and mobility.
- Have difficulty recognising unsafe situations or reporting concerns.
- Be more vulnerable to coercion, grooming or manipulation.
- Display distress or abuse-related concerns through changes in behaviour, presentation, emotional regulation, physical wellbeing or engagement rather than through verbal disclosure.

Staff must remain vigilant and should not assume that indicators of abuse, neglect or exploitation relate solely to a pupil's disability, communication needs, behaviour or medical condition. Safeguarding responses will be adapted to each pupil's individual needs, communication methods and level of understanding.

The following three safeguarding partners are identified in Keeping Children Safe in Education and defined within the Children Act 2004 (as amended by the Children and Social Work Act 2017). They are responsible for working together to safeguard and promote the welfare of children within Croydon:

- › Croydon Local Authority

- NHS South West London Integrated Care Board (ICB)
- Metropolitan Police Service

These partners work through the Croydon Safeguarding Children Partnership (CSCP) to coordinate safeguarding arrangements, information sharing and multi-agency responses to protect children and young people. The school will follow the procedures and guidance published by the Croydon Safeguarding Children Partnership (CSCP).

Local Safeguarding Arrangements

St Giles School recognises the safeguarding priorities identified by the Croydon Safeguarding Children Partnership (CSCP). These include early help and family support, effective multi-agency working, child sexual abuse and exploitation, child criminal exploitation, domestic abuse, online safety, emotional wellbeing, children missing from education, and safeguarding vulnerable children.

As a special school, St Giles places particular emphasis on safeguarding children with SEND, recognising that pupils with severe, profound and multiple learning difficulties may experience additional vulnerabilities, communication barriers and dependence on others for care and support. The school works closely with families and partner agencies to ensure that all pupils are protected from harm and receive appropriate support.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising, reporting or disclosing abuse. We are committed to anti-discriminatory practice and recognise children's diverse circumstances, identities and experiences. We ensure that all children receive equal protection and support, regardless of any barriers they may face.

At St Giles School, we recognise that many pupils have severe, profound and complex special educational needs and disabilities. Pupils may experience communication barriers, be reliant on intimate care, require support with personal care, have limited understanding of risk, or be dependent on adults for significant aspects of daily living. These factors can increase vulnerability to abuse, neglect, exploitation and bullying, while making it more difficult to recognise, resist or disclose harm. Staff will be particularly vigilant to these additional risks and will ensure that safeguarding arrangements are tailored to individual needs, communication methods and levels of understanding.

At St Giles School, we recognise that many pupils have Special Educational Needs and Disabilities (SEND) and may experience additional vulnerabilities, communication barriers and challenges in recognising or reporting abuse. Staff will be particularly vigilant to these risks and will ensure that safeguarding responses are adapted to meet individual needs.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identity or sexual orientation
- Have English as an additional language (EAL)
- Are known to be living in difficult circumstances, including temporary accommodation, family homelessness, substance misuse, domestic abuse
- Are at risk of female genital mutilation (FGM), child sexual exploitation (CSE), child criminal exploitation (CCE), forced marriage, honour-based abuse or radicalization, are asylum seekers, refugees or separated migrant children
- Are at risk due to either their own or a family member's mental health needs

- Are looked after, previously looked after, in kinship care or subject to special guardianship arrangements (see section 14)
- Are missing from education, persistently absent, or experiencing unexplained and/or prolonged absences from education
- Whose parent or carer has expressed an intention to remove them from school to be electively home educated
- Are vulnerable to online harms, including cyberbullying, grooming, exploitation and the creation or sharing of nude or semi-nude images
- Are known to social care, youth justice services or other safeguarding agencies

5. Roles and responsibilities

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

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

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

5.1 All staff

All staff will:

- 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.
- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance [Keeping Children Safe in Education](#) (KCSIE) in full and Annex A, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)

- Provide a safe and inclusive environment in which pupils, including those who are LGBTQ+, feel valued, respected and supported to communicate any concerns using their preferred method of communication.
- Ensure that safeguarding information, support and reporting mechanisms are delivered in formats accessible to pupils' individual communication needs, including the use of symbols, visuals, objects of reference, signing systems, assistive technology and personalised communication approaches.

All staff will be aware of:

- The additional safeguarding challenges faced by children with special educational needs and disabilities (SEND), including communication barriers, dependency on adults for personal care, reduced ability to recognise risk, increased vulnerability to bullying, exploitation, neglect, online harm, restrictive practices, financial abuse, and barriers to disclosure.
- That any changes in presentation, behaviour, emotional wellbeing, communication, attendance, physical condition or engagement may be indicators of safeguarding concerns and should be discussed with the DSL without delay.
- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation

- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Kelly Whiting /Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

The DSL can also be contacted outside school hours by email at kelly.whiting@st-giles.croydon.sch.uk

When the DSL is absent, Deputy DSL Hazel Earl (Family Liaison Officer) will act as cover and can be contacted at hearl18.306@lgflmail.org

If both the DSL and Deputy DSL are unavailable or absent, we have cover arrangements in place. Marianne Rodger-Weetman (Headteacher) will provide safeguarding cover. Staff should never delay reporting a safeguarding concern and should report concerns immediately to an available member of the Senior Leadership Team. Concerns can also be submitted in writing after sharing safeguarding concern verbally via the school's safeguarding email address: safeguarding@st-giles.croydon.sch.uk which is monitored to ensure safeguarding concerns can be acted upon promptly. Staff should never delay sharing a safeguarding concern because the DSL or Deputy DSL is unavailable.

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

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

The DSL will also:

- Keep the headteacher informed of any issues
- Encourage a culture of listening to pupils and taking account of their wishes and feelings, recognising that pupils may communicate in different ways and may require additional support to express concerns, worries or disclosures.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- › Ensure that child protection files are kept up to date
- › Where children leave the school, ensure their child protection file is transferred to the new school
- › Maintain oversight of safeguarding arrangements for pupils with SEND and complex medical needs, ensuring that reasonable adjustments are made to enable pupils to communicate worries, concerns or disclosures effectively.
- › Work closely with the SENCO, therapy teams, health professionals, social workers, family practitioners and the Croydon Safeguarding Children Partnership to ensure coordinated safeguarding support for pupils with complex needs.
- › Ensure that staff receive safeguarding training that reflects the specific vulnerabilities and communication needs of pupils attending St Giles School.
- › Monitor patterns of behaviour, injury, attendance, wellbeing, restrictive intervention, physical support, personal care and online activity which may indicate safeguarding concerns.

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The governing board

The governing board will:

- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Ensure that all staff read at least Part 1 of Keeping Children Safe in Education (KCSIE) and Annex A and that governors receive safeguarding training and read the sections of KCSIE relevant to their role.
- › Ensure a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a link Governor to monitor the effectiveness of this policy in conjunction with the full governing board.
- › Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- › Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- › Ensure the school has appropriate cyber security systems in place
- › Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

› Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND and complex health needs can face additional barriers to abuse or neglect being recognised, reported or addressed. Governors will ensure that safeguarding systems, policies, training, reporting processes and curriculum provision are appropriately adapted for pupils attending St Giles School.
- Receive regular assurance regarding safeguarding arrangements for pupils with complex SEND, including training, personal care practices, behaviour support strategies, restrictive intervention reporting, attendance monitoring and pupil voice.

› Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All Governors will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 19.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

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

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

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- › Communicating this policy to parents/carers when their child joins the school and via the school website
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- › Ensure that safeguarding and child protection practice reflects the needs of pupils with PMLD, SLD and complex communication needs, including implementation of appropriate communication systems across the school.
- › Ensure that sufficient appropriately trained staff are available to support pupils with personal care, intimate care, moving and handling, medical and behavioural needs in a manner that promotes dignity, safety and safeguarding.
- › Ensuring the relevant staffing ratios are met, where applicable
- › Making sure each child in the Early Years Foundation Stage is assigned a key person
- › Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

The school recognises that children with a social worker, children in care, previously looked-after children and children living in kinship arrangements may also have SEND and complex needs. The DSL, SENCO and relevant staff will work collaboratively with the Virtual School, social workers, carers and other agencies to promote attendance, educational achievement, wellbeing and safeguarding outcomes.

6. Confidentiality

Safeguarding information is confidential and will be handled in accordance with the Data Protection Act 2018, UK GDPR, the Data (Use and Access) Act 2025, Keeping Children Safe in Education (KCSIE) 2026, and Working Together to Safeguard Children 2026.

The welfare and safety of the child is always the school's paramount concern. Staff will share information on a need-to-know basis with appropriate professionals where this is necessary to promote the welfare of children or protect them from harm.

Where appropriate, pupils will be helped to understand how information may be shared in order to keep them safe, taking account of their age, understanding and communication needs.

Timely information sharing is essential to effective safeguarding. The school will work closely with Croydon Children's Social Care, the Croydon Safeguarding Children Partnership, health services, the police and other relevant agencies to ensure that children receive the right help at the right time.

Further information regarding record keeping can be found in Section [18], and allegations against staff are addressed in Appendix [3].

- The Data Protection Act 2018, the Data (Use and Access) Act 2025 and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.
- The school may share relevant personal information, including special category personal data where appropriate, without consent where there is a lawful safeguarding reason to do so.
- The school will follow the government's Information Sharing Advice for Safeguarding Practitioners and the seven golden rules of information sharing.
- Staff should only discuss safeguarding concerns with those who need to know in order to protect and support the child.
- Timely information-sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
- Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

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

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

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

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

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

Where there are concerns that a child is suffering, or is likely to suffer, significant harm, the DSL (or Deputy DSL) will make a referral to Croydon Children's Social Care through the Multi-Agency Safeguarding Hub (MASH) in accordance with Croydon Safeguarding Children Partnership procedures.

Any member of staff may make a referral directly to Children's Social Care if they believe a child is at risk of significant harm and a referral has not been made by the DSL.

If a child is in immediate danger or requires an urgent response, staff should contact the police on 999 and inform the DSL as soon as possible.

Croydon MASH - Telephone: 020 8255 2888 (Monday to Friday, 9.00am to 5.00pm)

Emergency Duty Team (Out of Hours) - Telephone: 020 8726 6400

Referrals should be made through the Croydon Children's Services Portal in line with local safeguarding procedures. Further information about reporting concerns can be found at: <https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

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

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

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

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

Keeping Children Safe in Education (KCSIE) explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

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

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is at risk of FGM, suspects that FGM has been carried out, or discovers that a pupil aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow the school's safeguarding procedures.

At St Giles School, any concern that a pupil may be at risk of FGM, or that FGM may have been carried out, must be reported immediately to the DSL or Deputy DSL and recorded in accordance with the school's safeguarding procedures.

The DSL will consider the need for an immediate referral to Croydon Children's Social Care via the Multi-Agency Safeguarding Hub (MASH) and, where appropriate, liaise with the police and other relevant agencies. FGM is a form of child abuse and will be treated as a safeguarding concern requiring immediate action.

Staff must not attempt to investigate concerns, examine pupils or contact parents/carers if doing so could place a child at increased risk of harm. All concerns will be managed in line with Keeping Children Safe in Education, Working Together to Safeguard Children and Croydon Safeguarding Children Partnership procedures.

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

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

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help assessment

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

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

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

Early Help and Family Help

St Giles School is committed to providing support as soon as concerns emerge and will work with families and partner agencies to ensure children receive the right help at the right time.

Where a child may benefit from early help or targeted family support, the DSL will work with the child, family and relevant agencies to identify needs and coordinate appropriate support. This may include consultation with Croydon Family Hubs, education, health, social care and other specialist services.

Staff who identify emerging concerns should discuss these with the DSL or Deputy DSL without delay. The DSL will consider whether an Early Help or Family Help assessment is appropriate and coordinate referrals where necessary.

The DSL will monitor the effectiveness of support arrangements and review progress regularly. Where concerns escalate, outcomes are not improving, or there is evidence that a child may be suffering or likely to suffer significant harm, a referral will be made to Croydon Children's Social Care via the Multi-Agency Safeguarding Hub (MASH).

The school will work in partnership with Croydon's safeguarding partners and other agencies to ensure children and families receive timely and appropriate support.

Referral

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

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

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

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

Local Referral and Escalation Procedures

Where a referral to Children's Social Care is required, the DSL (or Deputy DSL) will make the referral to Croydon Children's Social Care via the Multi-Agency Safeguarding Hub (MASH) and will maintain a written record of the concern, the action taken and the outcome.

Where a member of staff makes a referral directly, they must inform the DSL as soon as possible and ensure a written record is made.

The DSL will monitor the progress of all referrals and maintain regular communication with Children's Social Care and other relevant agencies.

If the school believes that appropriate action has not been taken, that a decision places a child at ongoing risk of harm, or that a child's circumstances are not improving, the DSL will follow the Croydon Safeguarding Children Partnership escalation procedures and challenge decisions appropriately.

Staff should always escalate concerns if they believe a child remains at risk. Professional disagreement must not prevent action being taken to safeguard and promote the welfare of a child.

In all cases, the child's welfare and best interests will remain the paramount consideration.

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

7.6 If you have a concern about mental health

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

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

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

At St Giles School, staff are well placed to observe pupils on a daily basis and identify early signs that a pupil may be experiencing mental health difficulties. Concerns may be identified through changes in behaviour, communication, emotional regulation, attendance, self-care, engagement in learning, presentation,

relationships, or self-injurious behaviours. Information from parents/carers, health professionals and other agencies will also be considered.

Any concerns regarding a pupil's mental health must be reported to the DSL or Deputy DSL and recorded in accordance with the school's safeguarding procedures.

The DSL will review the concern and determine whether it constitutes a safeguarding concern or whether additional support is required. The DSL will work with parents/carers, the school's Mental Health Lead, SENCO, health professionals and other relevant agencies, as appropriate.

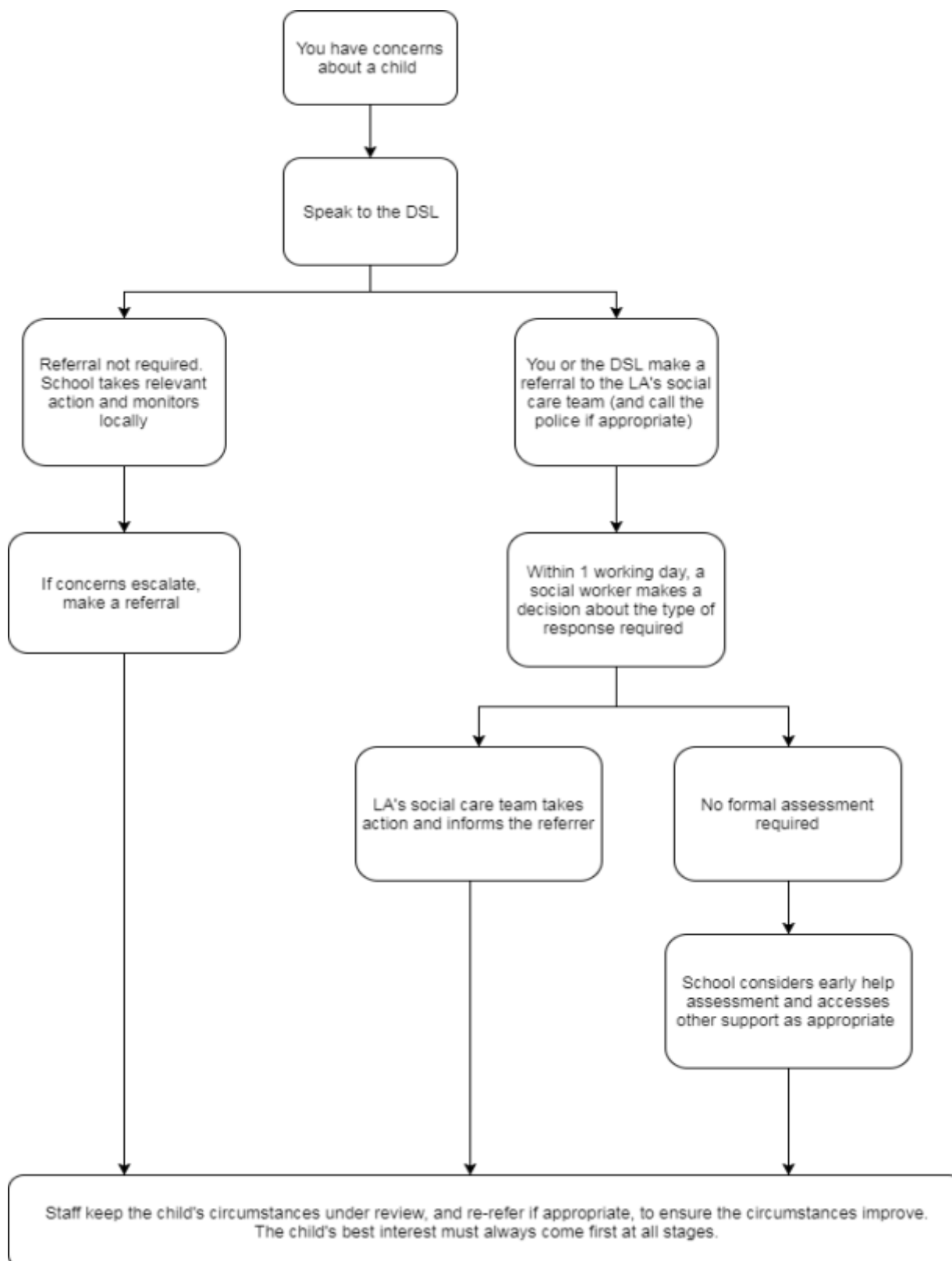
Where concerns relate to self-harm, suicidal ideation, significant emotional distress, or risk of harm to the pupil or others, safeguarding procedures will be followed immediately and referrals made to appropriate services as required.

The school will monitor and review concerns and ensure that pupils receive appropriate support. Where necessary, referrals may be made to CAMHS, health services, social care or other specialist agencies.

Given the complex needs of many pupils at St Giles School, staff should be particularly alert to changes in behaviour, communication, emotional regulation, engagement, self-care, or self-injurious behaviours, which may indicate unmet mental health needs or safeguarding concerns.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



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

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

St Giles School recognises that behaviour between pupils may, in some circumstances, raise safeguarding concerns. We will not tolerate abuse, exploitation, harmful sexual behaviour, violence, discrimination or any behaviour that places a pupil at risk of harm.

We recognise that many pupils at St Giles School have PMLD, SLD and complex needs, and that behaviour is often a form of communication. When considering incidents between pupils, the school will take account of each pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs.

Pupils with SEND may experience additional barriers to recognising, understanding, reporting or communicating abuse. Staff will therefore remain vigilant to concerns identified through changes in behaviour, communication, emotional wellbeing, physical presentation, relationships, self-injurious behaviours or interactions with others. Staff will not assume that concerns are solely related to a pupil's disability, learning needs, medical condition or communication difficulties.

Most incidents involving behaviour between pupils will be managed in accordance with the school's Behaviour for Communication Policy. However, where there are concerns that behaviour may indicate abuse, exploitation, coercion, harmful sexual behaviour, violence, discrimination or any other safeguarding concern, the matter will be managed in accordance with this Child Protection and Safeguarding Policy.

All concerns will be assessed on an individual basis and appropriate action taken to safeguard and promote the welfare of all pupils involved.

See appendix 4 for more information about child-on-child abuse.

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

If a pupil makes a disclosure, or staff observe or identify behaviour that may indicate abuse or harm involving another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will consider the nature of the concern and seek advice from Children's Social Care, the police or other relevant agencies as appropriate. Referrals will be made where required.

- The DSL will put a risk assessment and support plan into place for all pupils involved (including the victim(s), the pupil(s) alleged to have caused harm and any others affected). Support arrangements will take account of pupils' communication needs, developmental understanding, capacity, medical needs and SEND needs, and will identify a trusted adult who can provide appropriate support.
- The DSL will consider whether additional support is required from CAMHS, health professionals or other specialist services, as appropriate.
- Where an incident may constitute a criminal offence, the DSL will work closely with the police and other relevant agencies while continuing to safeguard and support all pupils involved. Any actions taken by the school will be informed by advice from the police and other relevant agencies, as appropriate.
- Allegations that meet the harms threshold against staff, volunteers, contractors, supply staff or governors will be managed in accordance with the school's Allegations of Abuse Against Staff Policy. Low-level concerns will be managed in accordance with the school's Low-Level Safeguarding Concerns Policy.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - A pupil may communicate distress through changes in behaviour, communication or emotional wellbeing
 - A member of staff, parent/carer or other professional may notice changes in a pupil's presentation or interactions with others
 - A pupil may become withdrawn, anxious or distressed in situations they previously managed well
 - A pupil's behaviour, communication or physical presentation may indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in coordinating the safeguarding response to any incident of child-on-child abuse and will ensure appropriate support is provided for all pupils involved.

Where appropriate, the school may take action in accordance with the Behaviour for Communication Policy whilst continuing to work with external agencies. Any action taken will take account of the age, developmental stage, communication needs, understanding, capacity, medical needs and SEND needs of the pupils involved.

The school will consider each case individually and, where relevant, work closely with Children's Social Care, the police and other agencies to ensure that all pupils are safeguarded and supported.

Where external agencies are investigating an incident, the school will liaise closely with those agencies and carefully consider whether any actions taken by the school could prejudice an investigation or subsequent prosecution.

7.9 Making or sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

The school recognises that incidents involving the making, possession or sharing of nude or semi-nude images may still present safeguarding concerns and will be responded to appropriately in accordance with national guidance and safeguarding procedures.

Staff should be aware that pupils with PMLD, SLD and complex needs may be particularly vulnerable to exploitation, coercion, manipulation or abuse involving images, technology and online activity. Pupils may lack the understanding, capacity or awareness to recognise risks associated with the creation or sharing of images.

If a member of staff becomes aware of an incident involving nude or semi-nude images, including those generated by AI, they must report the concern immediately to the DSL and follow the school's safeguarding procedures.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Investigate the incident yourself
- Share information about the incident with others who do not need to know.
- Say or do anything that could blame, shame or distress any pupil involved. You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

The DSL will consider the age, developmental stage, communication needs, understanding, capacity and SEND needs of the pupils involved and will respond in accordance with safeguarding guidance, seeking advice from external agencies where appropriate.

Initial review meeting

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

- Whether there is an immediate risk to any pupil and whether additional supervision or safeguarding measures are required
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved, including their age, developmental stage, communication needs, understanding, capacity, medical needs and SEND needs, which may influence risk assessment and decision making
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a pupil has been coerced, manipulated, exploited, groomed or pressured, or where there are concerns regarding their ability or capacity to understand, consent to or participate in the activity
- What the DSL knows about the images or videos suggests content that is inappropriate for the pupil's age, developmental stage or level of understanding, or that is violent, abusive or exploitative

- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

The DSL will consider the age, developmental stage, communication needs, understanding, capacity, medical needs and SEND needs of the pupils involved when assessing risk and determining an appropriate safeguarding response. In a special school setting, particular consideration will be given to pupils' ability to understand, consent to, participate in or report incidents involving technology, images and online activity.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

The DSL will gather information from the pupils involved, where appropriate, using communication methods that are suitable for their age, developmental stage, understanding and communication needs. Information may also be gathered from staff, parents/carers and other professionals who know the pupil well.

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

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would place the pupil at risk of harm or prejudice a safeguarding, social care or police investigation.

Referring to the police

If it is necessary to refer an incident to the police, the DSL will do so through the appropriate police channels. In non-emergency situations, this will normally be via Police 101, following consultation with Children's Social Care and other relevant agencies where appropriate.

If a child is in immediate danger or a crime is in progress, staff should contact the police immediately by dialling 999 and inform the DSL as soon as possible.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. Records will include the rationale for decisions made, any risk assessments undertaken, support provided, referrals made and actions taken. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

St Giles School recognises that pupils have a wide range of learning, communication and developmental needs. Teaching about online safety, personal safety, privacy, consent, healthy relationships and the safe use of technology is adapted to pupils' age, developmental stage, understanding and communication needs.

Where appropriate, pupils are taught through Relationships Education, Relationships and Sex Education (RSE), Personal Development and Computing about:

- Personal safety and privacy.
- Safe and appropriate use of technology and the internet.
- Recognising trusted adults and seeking support when worried.
- Personal boundaries and consent.

- Respect for themselves and others.
- Understanding which parts of the body are private.
- The risks associated with sharing photographs, videos and personal information online.
- How to respond if they receive inappropriate content or feel uncomfortable online.

Teaching is delivered using communication methods and resources appropriate to pupils' individual needs, which may include visual supports, symbols, objects of reference, social stories, assistive technology and personalised communication approaches.

Where relevant and appropriate to individual pupils, teaching may also include information about the risks associated with sharing images, personal information and online content, including the making or sharing of nude or semi-nude images and AI-generated content.

Teaching follows best practice by:

- Putting safeguarding first.
- Promoting understanding, communication and pupil voice.
- Empowering pupils to express worries, concerns and seek help from trusted adults.
- Supporting pupils to develop safe relationships, personal boundaries and respect for others.
- Using age, developmentally and cognitively appropriate approaches.
- Never using fear-based approaches.
- Challenging victim-blaming attitudes.
- Ensuring learning is accessible, meaningful and appropriate to individual pupils' needs and abilities.

7.10 Reporting systems for our pupils

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

We recognise the importance of ensuring pupils feel safe, supported and able to communicate worries, concerns or allegations in ways that are appropriate to their individual needs.

To achieve this, we will:

- Put systems in place that enable pupils to communicate concerns in a way that is accessible and appropriate for them.
- Ensure our reporting systems are well promoted, easily understood and accessible to pupils.
- Make it clear to pupils that their concerns will be taken seriously and that they will be listened to and supported.
- Ensure pupils know who their trusted adults are and how to seek help when they are worried or upset.
- Provide opportunities throughout the school day for pupils to communicate worries or concerns using their preferred method of communication.
- Use communication approaches appropriate to pupils' needs, including visual supports, symbols, signing, objects of reference, assistive technology and other personalised communication systems where appropriate.

Pupils are made aware of how to seek help through the curriculum, assemblies, Personal Development, RSE, online safety education, daily interactions with staff and regular reinforcement of safeguarding messages.

Following any disclosure or safeguarding concern, pupils will be reassured that they have done the right thing, that they are being taken seriously and that appropriate adults will help to keep them safe.

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

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

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology.
- Set clear guidelines for the use of mobile phones and other mobile technology for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

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

- Educate pupils about online safety, personal safety, privacy, consent and the safe use of technology through a curriculum adapted to their age, developmental stage, understanding and communication needs.
- Teach pupils, where appropriate, about recognising trusted adults, seeking help when worried, keeping personal information safe and responding to inappropriate online content.
- Use communication methods and resources appropriate to pupils' individual needs, including visual supports, symbols, signing, assistive technology and personalised communication approaches.
- Recognise that pupils with PMLD, SLD and complex needs may be particularly vulnerable to online exploitation, coercion, grooming and abuse, including through the misuse of images, devices and technology.
- Train staff, as part of their induction and ongoing safeguarding training, on online safety, cyberbullying, online exploitation, online radicalisation and the school's filtering and monitoring systems.
- Educate parents/carers about online safety through meetings, newsletters, the school website and direct communication where appropriate.
- Ensure staff only use school-approved devices and systems for recording, storing and sharing information relating to pupils, and never use personal devices to photograph, record or communicate with pupils.
- Ensure all staff, volunteers and governors understand their responsibilities regarding the safe and appropriate use of technology.
- Maintain appropriate filtering and monitoring systems on school devices and networks to help protect pupils from harmful or inappropriate online content.
- Regularly review online safety arrangements, filtering and monitoring systems and emerging online risks.
- Provide regular safeguarding updates to staff, including developments in online safety and technology-related risks.
- Carry out an annual review of the effectiveness of filtering and monitoring systems.
- St Giles School recognises that many pupils have limited independent access to technology and social media. Online safety education and support will therefore be tailored to pupils' individual needs, developmental stage, communication abilities and level of understanding.

Mobile Phones and Cameras

In the Early Years Foundation Stage, the use of mobile phones and cameras is managed in line with the requirements of the EYFS framework and the school's staff code of conduct.

Staff may bring personal mobile phones onto the school site but these must not be used in areas where children are present, except in exceptional circumstances authorised by the Headteacher. Personal mobile phones must not be used to photograph, record or store images of pupils.

Only school-approved devices may be used to take photographs, videos or recordings of pupils for educational purposes or to evidence learning and progress. Any images or recordings will be stored securely in accordance with the school's data protection and information security procedures.

Visitors, students, volunteers and contractors are expected to follow the school's procedures regarding the use of mobile phones, cameras and recording devices while on site.

Any concerns regarding the use of mobile phones, cameras or recording devices will be reported immediately to the DSL and managed in accordance with the school's safeguarding procedures.

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

8.1 Artificial intelligence (AI)

Artificial Intelligence (AI) is increasingly used in education, technology and online environments. Whilst AI can support learning, communication and accessibility, it may also present safeguarding risks, including exposure to inappropriate content, online exploitation, bullying, harassment, misinformation, and the creation or sharing of manipulated or AI-generated images, videos or audio.

The school will treat any misuse of AI technology, including the creation, possession or sharing of harmful, inappropriate or abusive content, as a safeguarding concern and respond in accordance with this policy.

Staff will remain vigilant to the safeguarding risks associated with AI and will report any concerns to the DSL. Any safeguarding concerns relating to AI-generated content, including AI-generated nude or semi-nude images, will be managed in line with the school's safeguarding procedures and relevant statutory guidance.

Any AI tools used within the school will be subject to appropriate risk assessment, filtering and monitoring arrangements and will be used in accordance with school policies and data protection requirements.

St Giles School recognises that pupils with PMLD, SLD and complex needs may be particularly vulnerable to manipulation, exploitation or the misuse of images and technology. Appropriate supervision and support will be provided when pupils access technology and online resources.

9. Notifying parents or carers

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

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

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

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

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

- Meet with the victim's parents or carers and, where appropriate, the pupil, to discuss the support and safeguarding measures being put in place and to understand the pupil's wishes and feelings, taking account of their age, developmental stage, communication needs and level of understanding.
- Meet with the parents or carers of the pupil alleged to have caused harm to discuss the support available to them and any measures being put in place, including any arrangements required to safeguard all pupils involved.
-

The school will use communication approaches appropriate to the individual pupil to ensure their views, wishes and feelings are sought and taken into account wherever possible.

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

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – difficulties understanding risk, personal boundaries, consent, online content, social interactions or the consequences of actions, which may increase vulnerability to abuse, exploitation or harm.

We offer extra pastoral support for these pupils. This includes:

- Access to trusted adults who know pupils well.
- Close working between the DSL, Deputy DSLs, SENCO, Family Liaison Officer, therapists, health professionals and other agencies involved in the pupil's care.
- The use of communication approaches tailored to individual pupils, including visual supports, symbols, signing, objects of reference, assistive technology and other personalised communication systems.
- Individualised support plans and risk assessments where appropriate.
- Additional support during periods of change, transition, emotional distress or increased vulnerability.
- Close partnership working with parents and carers to promote pupils' wellbeing and safety.

Any safeguarding concerns involving pupils with SEND, medical needs or disabilities will require close liaison between the DSL (or deputy), relevant school staff and external professionals, where appropriate. The school will ensure that safeguarding arrangements, communication approaches and support strategies are adapted to meet the individual needs of the pupil.

11. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

St Giles School recognises that many pupils have complex medical needs and may be dependent on adults for aspects of their healthcare, personal care and daily living needs. Staff will remain vigilant to any concerns regarding unmet medical needs, inappropriate management of medical conditions, missed medication, inadequate care arrangements, unexplained changes in health, wellbeing or presentation, or any indication that a pupil's medical needs are not being met safely and appropriately.

Any concerns relating to a pupil's medical care, treatment or wellbeing will be reported to the DSL and considered alongside the pupil's wider safeguarding needs. Where necessary, the school will work closely with

parents/carers, health professionals and external agencies to ensure that appropriate support and protection are in place.

12. Young carers

The school recognises that some pupils may live in families where caring responsibilities impact on family wellbeing and may increase vulnerability. Where concerns are identified, the school will work with families and relevant agencies to ensure appropriate support is available.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding, welfare or complex family circumstances. We recognise that experiences of adversity and trauma can leave children vulnerable to further harm and may affect their wellbeing, engagement, communication, behaviour, emotional regulation and educational progress.

The DSL and all members of staff will work closely with social workers and other professionals to help safeguard and support vulnerable pupils.

Where the school is aware that a pupil has a social worker, the DSL will always take this into account when making decisions in the pupil's best interests and promoting their safety, welfare and educational outcomes.

This may inform decisions relating to:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral, communication, therapeutic and educational support
- Individual risk assessments and safeguarding arrangements.
- Transition planning and multi-agency working.
- Support for attendance, wellbeing and family

14. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Kelly Whiting (Deputy Headteacher), who is responsible for promoting the educational achievement, wellbeing and inclusion of looked-after and previously looked-after children in line with statutory [statutory guidance](#).

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

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads and other relevant professionals to promote the educational achievement, wellbeing and wider needs of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be used to support the outcomes identified in their personal education plans.

15. Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay or bisexual is not in itself a risk factor for harm. However, pupils who are, or who may be perceived by others to be, lesbian, gay or bisexual can be vulnerable to bullying, discrimination, harassment and prejudice-based incidents.

Any concerns should be reported to the DSL.

The school will provide appropriate pastoral and safeguarding support to any pupil experiencing bullying, discrimination or harassment. Support will be tailored to the individual needs of the pupil and may include support from trusted adults, pastoral support, family liaison, risk assessments where appropriate, and referrals to external agencies where required.

The school will ensure that all pupils are treated with dignity, respect and inclusion, and that any discriminatory language, behaviour or bullying is challenged and addressed promptly.

Where appropriate, pupils will be supported to express their wishes, feelings and concerns using communication methods suited to their individual needs and level of understanding.

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We recognise that some pupils may experience questions or uncertainty relating to their gender. The school is committed to providing a safe, inclusive and supportive environment for all pupils.

We recognise that pupils who are questioning their gender may be vulnerable to bullying, discrimination, harassment, social isolation or poor emotional wellbeing. Any concerns relating to a pupil's welfare or safety should be reported to the DSL.

The school will take a strong and proactive approach to preventing and responding to bullying, harassment and discrimination of any kind. All pupils will be treated with dignity, respect and compassion.

When supporting a pupil who is questioning their gender, the school will take account of the pupil's age, developmental stage, communication needs, level of understanding, wishes and feelings, as well as their overall wellbeing and safeguarding needs.

The DSL will lead the school's safeguarding response in these cases and will work with parents/carers and relevant professionals, where appropriate, to ensure the pupil receives suitable support and protection.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where the school becomes aware, through discussion, observation or information shared by the pupil, family or professionals, that a pupil may be questioning their gender, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or making any decisions.

Where the school becomes aware that a pupil may be questioning their gender, the school will only share this information where there is a safeguarding concern, another lawful reason to do so, or where sharing the information is necessary to support the pupil's welfare.

The school will take account of the pupil's age, developmental stage, communication needs, level of understanding, wishes and feelings when considering how best to support them and involve parents/carers.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, where the school becomes aware that a pupil may be questioning their gender, or where a parent/carer requests that the school makes changes or puts support in place to facilitate a pupil presenting as the opposite biological sex ("social transition"), the school will work with parents/carers to determine what is in the best interests of the pupil and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and the pupil's parents/carers have been involved, as set out in [Keeping Children Safe in Education](#) (KCSIE). Any decision will take account of the pupil's age, developmental stage, communication needs, level of understanding, wishes and feelings, where these can be ascertained, alongside the welfare and best interests of the pupil and other children.

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the pupil and other children. The school will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children. The first step when considering whether support relating to social transition is appropriate will be to consider what is in the best interests of the pupil and other children. Any decision will take account of the pupil's age, developmental stage, communication needs, level of understanding, wishes and feelings, where these can be ascertained
- Parents and carers should be actively involved and their views treated with importance. Except in the rare circumstances where involving parents or carers would constitute a greater risk to the pupil than not involving them, where the school becomes aware that a pupil may be questioning their gender, parents/carers will be engaged as a matter of priority and their views will be carefully considered alongside the welfare and best interests of the pupil.
- Accommodating social transition is an active intervention and the school will take a careful and considered approach. The school recognises that decisions relating to social transition may have significant implications for a pupil's wellbeing, development and longer-term outcomes.
- The school will comply with its obligations under the Equality Act and Human Rights Act when considering requests for support relating to social transition

The school will ensure that the decision-making process is documented and appropriate records are maintained.

The circumstances, needs and understanding of a pupil may change over time. The school will keep any arrangements under review and will involve the DSL in any review of decisions relating to social transition.

16.4 Rules on single-sex spaces

Pupils are not permitted to use toilets, changing rooms, showers designated for the opposite biological sex, except where specific arrangements have been agreed by the school in accordance with safeguarding requirements, relevant legislation and statutory guidance.

16.5 Rules on single-sex sports

The school will comply with relevant legislation and statutory guidance when making decisions regarding participation in sport, physical activity and recreational activities.

When planning activities, the school will consider the safety, wellbeing, age, developmental stage, physical needs, medical needs and SEND needs of all pupils. Decisions will be made on an individual basis where appropriate and in the best interests of all pupils involved.

17. Context of Safeguarding Incidents

Safeguarding incidents and behaviours can be associated with factors outside the school and can occur in a range of settings beyond the family home. All staff, but especially the Designated Safeguarding Lead (DSL), should consider whether a pupil may be at risk of abuse, neglect or exploitation in the wider community, online, during transport arrangements, or through contact with peers, adults or others outside of school.

This is known as contextual safeguarding and may include risks linked to peer relationships, online activity, the local community, public spaces, transport, clubs, services and other settings in which children spend time.

As a special school for pupils with PMLD, SLD and complex needs, St Giles School recognises that some pupils may be particularly vulnerable to contextual safeguarding concerns due to communication difficulties, social vulnerability, dependency on adults, limited awareness of danger and reliance on others for personal care and support.

Staff will remain alert to signs that a pupil may be experiencing abuse, neglect or exploitation outside of their home or school environment and will record and report concerns in accordance with the school's safeguarding procedures.

The school will work closely with parents/carers, Croydon Children's Social Care, the police, health professionals and other relevant agencies where contextual safeguarding concerns are identified to ensure that appropriate support and protective measures are put in place.

Any concerns relating to contextual safeguarding will be reported to the DSL and recorded in accordance with the school's safeguarding procedures.

18. Use of the School Premises for non-school activities

Where school facilities or premises are hired, rented or made available to external organisations or individuals, including providers delivering community, leisure or extracurricular activities, St Giles School will ensure that appropriate safeguarding arrangements are in place to keep pupils safe.

Where activities are provided under the direct supervision or management of St Giles School staff, the school's safeguarding and child protection procedures will apply. The school will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where activities are provided separately by another organisation or individual, the school will seek assurance that appropriate safeguarding and child protection policies and procedures are in place. This may include obtaining evidence of safer recruitment practices, DBS checks, safeguarding training and arrangements for responding to child protection concerns.

The school will ensure that safeguarding requirements are included within any lease, licence, lettings or hire agreement as a condition of the use of school premises. Failure to comply with safeguarding requirements may result in the termination of the agreement.

External providers, clubs, charities, community groups and organisations using the school site are expected to work in partnership with the school and adhere to local safeguarding arrangements and expectations.

Extracurricular Activities and Clubs

External organisations that host extracurricular activities and clubs at the school, including charities, community groups and commercial providers, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are expected to understand their safeguarding responsibilities and promote the welfare of children and young people. Paid and volunteer staff must know how to respond to safeguarding concerns and how to make a referral to Children's Social Care, the police or other appropriate agencies where necessary.

Where relevant, organisations delivering sporting activities on the school site should have regard to the Standards for Safeguarding and Protecting Children in Sport and any applicable national governing body safeguarding requirements.

Any safeguarding concerns arising during activities delivered by external organisations or individuals on school premises must be reported immediately to the Designated Safeguarding Lead (DSL).

As a special school for pupils with PMLD, SLD and complex needs, St Giles School expects all organisations using the school site to recognise the additional vulnerabilities of some pupils, including communication difficulties, medical needs, dependency on adults and the need for appropriate supervision and support. External providers must ensure that reasonable adjustments and suitable safeguarding arrangements are in place to meet pupils' individual needs.

The Headteacher and Governing Body will maintain appropriate oversight of safeguarding arrangements relating to the use of school premises by external organisations and providers.

19. Alternative Provision

St Giles School remains responsible for the safeguarding and welfare of pupils who attend alternative provision (AP).

When placing a pupil with an alternative provider, the school will obtain written confirmation that appropriate safeguarding arrangements are in place and that all relevant safeguarding checks have been carried out on staff working at the provision. The school will satisfy itself that the placement is safe, suitable and capable of meeting the pupil's individual educational, health, communication and support needs.

The vast majority of pupils at St Giles School have PMLD, SLD and complex medical needs and are therefore unlikely to access alternative provision. However, where alternative provision is considered appropriate for a pupil, the school will ensure that the placement can safely meet the pupil's educational, medical, communication, mobility and personal care needs. The school will take account of the pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs when assessing the suitability of any placement.

Where a pupil attends alternative provision, St Giles School recognises that they may be particularly vulnerable to safeguarding risks and will ensure that appropriate support, supervision and safeguarding arrangements are in place throughout the placement.

The school will obtain written assurance from the alternative provider that it will inform the school immediately of any safeguarding concerns, incidents, significant changes in circumstances, or arrangements that may place a pupil at risk of harm.

The school will continue to carry out appropriate safeguarding checks and its own due diligence to ensure that the alternative provision remains suitable, safe and capable of meeting the pupil's individual needs.

The school will ensure that the location of any pupil attending alternative provision is known at all times and will maintain accurate records of the address of the alternative provider, including any subcontracted provision, satellite site or alternative location the pupil may attend.

The school will maintain regular communication with the alternative provider, parents/carers and relevant professionals to ensure that information relating to a pupil's welfare and safety is shared appropriately.

Any safeguarding concerns relating to a pupil attending alternative provision will be recorded and reported in accordance with the school's safeguarding procedures. Where safeguarding concerns arise, the placement will be reviewed immediately and may be suspended or terminated where necessary, unless or until those concerns have been satisfactorily addressed.

The Designated Safeguarding Lead (DSL) will work closely with the alternative provider, Croydon Children's Social Care and other relevant agencies where safeguarding concerns are identified.

20. Work Experience

St Giles School recognises the importance of work experience and preparation for adulthood opportunities for pupils where these are appropriate to their individual needs and abilities.

The vast majority of pupils at St Giles School have PMLD, SLD and complex medical needs and may not access traditional work experience placements. However, where work experience opportunities are identified as appropriate, the school will ensure that placements are carefully planned and risk assessed to meet the pupil's individual educational, medical, communication, mobility and support needs.

For many pupils, work experience and preparation for adulthood opportunities are likely to take place within the school environment or through carefully supported activities and partnerships arranged by the school. Where external placements are accessed, appropriate safeguarding, supervision and support arrangements will be put in place.

When a pupil is placed on a work experience placement, the school will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place and that suitable arrangements exist to safeguard the pupil throughout the placement.

The school will not allow a person who is barred from engaging in regulated activity to undertake regulated activity with a pupil on a work experience placement.

Where work experience is arranged within the school, an enhanced DBS check will be obtained where required in accordance with statutory guidance and safer recruitment requirements. Where a pupil undertaking work experience is over the age of 16, appropriate supervision and safeguarding arrangements will be in place.

The school will ensure that providers are aware of any relevant information relating to a pupil's health, communication, accessibility, personal care and support needs, where appropriate and in accordance with information-sharing procedures.

Any safeguarding concerns arising during a work experience placement will be reported immediately to the Designated Safeguarding Lead (DSL) and managed in accordance with the school's safeguarding procedures.

21. Complaints and concerns about school safeguarding policies

21.1 Complaints against staff

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

21.2 Other complaints

Safeguarding-related complaints concerning pupils, adults, visitors, contractors, volunteers, school premises or the implementation of safeguarding procedures will be taken seriously and responded to promptly.

Concerns should be reported to the Headteacher in the first instance. The DSL will consider the nature of the concern and determine any appropriate action, including whether referrals to external agencies are required.

Where a complaint relates to the conduct of a member of staff, it will be managed in accordance with the school's Allegations of Abuse Against Staff Policy and Low-Level Concerns Policy, as appropriate.

Parents/carers who wish to raise a safeguarding concern may do so through the school's safeguarding procedures or complaints procedure. The school will ensure that concerns are investigated fairly, proportionately and in line with policy.

In the Early Years Foundation Stage, all safeguarding and welfare complaints will be managed in accordance with the requirements of the EYFS Statutory Framework. Records of complaints will be maintained and made available to relevant regulatory bodies where required.

The welfare, safety and best interests of the child will remain the paramount consideration throughout the complaints process.

21.3 Whistleblowing

The school has a separate Whistleblowing Policy and Procedure which enables staff, volunteers, governors, contractors and other adults working in the school to raise concerns about poor or unsafe practice, potential failures in safeguarding arrangements, misconduct or wrongdoing.

All staff should feel able to raise concerns about safeguarding practice and know that such concerns will be taken seriously and acted upon appropriately.

Further information can be found in the school's Whistleblowing Policy and Procedure.

22. Record-keeping

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

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

Records will be clear, accurate, factual, contemporaneous and stored securely in accordance with data protection requirements and the school's record retention procedures.

Where a safeguarding concern relates to a pupil with PMLD, SLD or complex needs, records will include relevant information about the pupil's communication needs, developmental stage, level of understanding, medical needs and any reasonable adjustments made to support communication and participation.

The DSL will ensure that safeguarding records are reviewed regularly, kept separate from the main pupil file, and shared securely with relevant agencies where appropriate and in accordance with statutory guidance and information-sharing requirements.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A record of any action taken, decisions reached, the rationale for those decisions, and the outcome
- Details of any referrals made to external agencies and any responses received.

Where relevant, information about the pupil's communication needs, developmental stage, level of understanding, medical needs and any reasonable adjustments made to support communication and participation.

Concerns and referrals will be kept in a separate child protection file for each child and will only be accessible to those who need the information in order to safeguard and support the child.

Safeguarding records relating to individual children will be retained in accordance with the school's records retention schedule and relevant statutory guidance.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, college or setting, the DSL will ensure that their child protection file is transferred securely and separately from the main pupil file, as soon as possible.

To enable appropriate safeguarding support to be in place when the child arrives, the file will be transferred:

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

In addition, if the concerns are significant or complex, and/or Children's Social Care is involved, the DSL will speak directly with the DSL of the receiving school, college or setting and provide information to enable appropriate safeguarding arrangements to be put in place prior to the pupil's arrival.

- The school maintains safeguarding records electronically using CPOMS. Access to safeguarding records is restricted to the DSL, Deputy DSLs and other authorised staff who require access in order to fulfil their safeguarding responsibilities.
- Safeguarding records are stored securely and separately from the main pupil file. The school takes appropriate measures to protect the confidentiality, integrity and security of all safeguarding information in accordance with data protection legislation and the school's information management procedures.
- Safeguarding records are retained in accordance with the school's records retention schedule and relevant statutory guidance.
- Information will be shared with relevant agencies where it is necessary to safeguard and promote the welfare of a child. Information-sharing decisions will be made on a case-by-case basis and in accordance with statutory guidance, data protection legislation and local safeguarding procedures. The school will work closely with Children's Social Care, health professionals, the police, education services and other relevant agencies to ensure children receive the right help and protection at the right time.

The welfare and safety of the child will always be the paramount consideration when decisions about information sharing are made.

In addition:

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

23. Training

23.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

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

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). This will include training on recognising and responding to safeguarding concerns in pupils with PMLD, SLD and complex needs, including the additional barriers that pupils may experience in recognising, understanding, communicating or reporting abuse.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

23.2 The DSL and deputies

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

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

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

The DSL and deputies will also ensure that they maintain an up-to-date understanding of safeguarding issues affecting pupils with PMLD, SLD and complex needs, including communication barriers, medical vulnerability, mental health, online safety, intimate care and contextual safeguarding risks.

23.3 Governors

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding
- Understand the particular safeguarding vulnerabilities and needs of pupils with PMLD, SLD, complex medical needs and communication difficulties.

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

23.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

23.5 Staff who have contact with pupils and families

All staff who have contact with pupils and families will receive appropriate supervision, support, coaching and training to promote the welfare, safety and wellbeing of pupils and to support effective safeguarding practice. Supervision will provide opportunities for confidential discussion of sensitive issues, reflection on practice and identification of any additional training or support needs.

Staff working with pupils with PMLD, SLD and complex needs will receive training and support appropriate to their role, including safeguarding, communication, behaviour support, medical needs, intimate care and positive handling where appropriate.

Staff working within the Early Years Foundation Stage will hold appropriate qualifications and training in accordance with the requirements of the EYFS Statutory Framework.

The school will ensure that pupils are appropriately supervised at all times and that staffing arrangements are planned to meet pupils' educational, medical, personal care and safeguarding needs. Particular attention will be given to periods that may present increased vulnerability, including personal care, therapy sessions, educational visits, transport arrangements and meal times.

Parents/carers will be informed about relevant staffing arrangements where appropriate, and the school will work closely with families and professionals to ensure that pupils receive safe, effective and consistent support.

24. Monitoring arrangements

This policy will be reviewed **annually** by Marianne Rodger-Weetman (Headteacher). At every review, it will be approved by the full governing board.

25. Links with other policies

This policy links to the following policies and procedures:

- Allegations of Abuse Against Staff Policy
- Attendance Policy
- Behaviour for Communication Policy
- Complaints Policy
- Data Protection Policy
- Equality Policy
- First Aid Policy
- Health and Safety Policy
- Intimate Care Policy
- Low-Level Safeguarding Concerns Policy
- Online Safety Policy
- Privacy Notices
- Relationships and Sex Education (RSE) Policy
- Safer Recruitment Policy
- SEND Policy and Information Report
- Staff Code of Conduct
- Supporting Pupils with Medical Conditions Policy
- Whistleblowing Policy and Procedure

- These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education (KCSIE) 2026**.

Appendix 1: types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

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

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 of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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

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

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

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

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Safer recruitment policy

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Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- We will consider carrying out an online search on shortlisted candidates as part of our due diligence checks in line with Keeping Children Safe in Education (KCSIE).

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

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

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity

- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check:
 - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
 - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

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

Regulated activity means a person who will be:

- Responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

Existing staff and volunteers

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

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

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

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Agency and third-party staff

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

Contractors

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

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

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

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

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

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

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

Trainee/student teachers

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

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

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

Volunteers

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Obtain references for volunteers before they are recruited
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

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

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

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

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

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

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

Allegations against staff (including low-level concerns) policy

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Section 1: allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education (KCSIE) 2026.

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

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

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

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

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

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children (where possible and in line with schools' ability to do so)
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children (where possible and in line with schools' ability to do so)
- The pupil(s) will not move classes in order to not come into contact with the individual

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
 - Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
 - The individual will be advised of the support available to them, which may include their trade union representative, professional association, a work colleague, occupational health services, the local authority's HR service and employee wellbeing support services where available. The school will take reasonable steps to support the health, wellbeing and welfare of the individual throughout the process.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

Additional considerations for supply teachers, trainee teachers, and all contracted staff

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

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

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

Concerns may arise through, for example:

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

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

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

The school promotes a culture of openness, transparency and accountability. Staff are encouraged to raise concerns about safeguarding practice, poor practice or the behaviour of adults working in the school at the

earliest opportunity. Concerns may be raised directly with the Headteacher, DSL or through the school's Whistleblowing Policy and Procedure.

Responding to low-level concerns

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

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

All low-level concerns will be responded to in a proportionate and timely manner. The headteacher will consider the nature of the concern, any previous concerns relating to the individual, the context in which the concern arose and any potential safeguarding risks.

Where appropriate, the headteacher may:

- Hold a discussion with the individual concerned.
- Provide advice, guidance or support.
- Review professional boundaries and expectations.
- Arrange additional supervision, training or monitoring.
- Refer the matter to disciplinary procedures where appropriate.
- Consult the DSL, HR provider, Local Authority Designated Officer (LADO) or other relevant professionals for advice.

The school promotes a culture of openness, transparency and accountability. Staff are encouraged to raise concerns at the earliest opportunity and can do so through normal management channels, the DSL, Headteacher or the school's Whistleblowing Policy and Procedure.

Records of low-level concerns will be maintained in accordance with this policy and will be reviewed to identify any patterns of behaviour that may indicate an increased safeguarding risk.

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- › The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

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Appendix 4: specific safeguarding issues

This appendix outlines specific safeguarding issues that staff should be aware of in line with Keeping Children Safe in Education (KCSIE) 2026 and local safeguarding procedures.

Staff should be aware of the indicators, risk factors and protective actions associated with a wide range of safeguarding concerns and should report any concerns to the DSL immediately. The school will work in partnership with parents/carers, Children's Social Care, health professionals, the police and other relevant agencies to safeguard and promote the welfare of children.

As a special school for pupils with PMLD, SLD and complex needs, St Giles School recognises that pupils may experience additional barriers to recognising, understanding, communicating or reporting abuse. Staff will take account of pupils' communication needs, developmental stage, level of understanding, capacity and SEND needs when considering any safeguarding concern.

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must be referred immediately to the police and/or Children's Social Care. However, as adult-involved incidents can initially present as child-on-child nude or semi-nude sharing, it may be difficult to identify adult involvement at the outset.

St Giles School recognises that pupils with PMLD, SLD, complex medical needs and communication difficulties may be particularly vulnerable to grooming, coercion, manipulation, exploitation and abuse, including online abuse. Pupils may experience additional barriers to recognising unsafe situations, understanding risk, communicating concerns or reporting abuse.

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

When assessing concerns, staff and the DSL will take account of the pupil's age, developmental stage, communication needs, level of understanding, capacity, medical needs and SEND needs. Any concern that an adult may be involved in the creation, possession, sharing or distribution of nude or semi-nude images involving a child will be treated as a safeguarding matter requiring immediate action.

The school will work closely with Children's Social Care, the police, parents/carers and other relevant professionals to ensure that appropriate safeguarding and support measures are put in place for the pupil.

Sexually motivated incidents

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

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

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

Staff should be aware that pupils with PMLD, SLD, complex medical needs and communication difficulties may be particularly vulnerable to grooming, manipulation and exploitation. Some pupils may have limited understanding of online relationships, privacy, personal boundaries and the risks associated with sharing information or images. They may also experience additional barriers to recognising, understanding or reporting abuse.

Where concerns arise, staff will take account of the pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs. Any indication that a pupil has been groomed, coerced, manipulated or exploited will be treated as a safeguarding concern and reported immediately to the DSL.

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

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

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

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

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

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

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

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

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

Staff should be aware that pupils with PMLD, SLD, complex medical needs and communication difficulties may be particularly vulnerable to grooming, manipulation and exploitation online. Some pupils may have a limited

understanding of online relationships, privacy, personal boundaries and the risks associated with sharing information or images. They may also experience additional barriers to recognising, understanding, communicating or reporting abuse.

When concerns arise, staff will take account of the pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs. Indicators of grooming, coercion or exploitation may not always present in the same way as they do for their peers. Any indication that a pupil has been groomed, manipulated, coerced or exploited will be treated as a safeguarding concern and reported immediately to the Designated Safeguarding Lead (DSL).

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

As a special school for pupils with PMLD, SLD and complex needs, St Giles School recognises that prolonged or repeated absence may be a particular indicator of increased vulnerability. Staff will consider the impact of absence on a pupil's welfare, health needs, communication development, emotional wellbeing and access to specialist provision.

Where there are concerns regarding a pupil's attendance, welfare or safety, the school will work closely with parents/carers, the Education Welfare Service, Children's Social Care, health professionals and other relevant agencies to identify and address barriers to attendance and ensure appropriate safeguarding measures are in place.

Any concerns relating to unexplained absence, patterns of absence or a pupil becoming missing from education will be reported to the DSL and recorded in accordance with the school's safeguarding procedures.

If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

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

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

For some pupils with SEND, PMLD, SLD and complex communication needs, changes in attendance patterns, presentation or engagement may be indicators of unmet needs or safeguarding concerns. Staff will consider the individual circumstances of each pupil when assessing risk and determining appropriate support and intervention.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

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

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

As a special school for pupils with PMLD, SLD and complex needs, St Giles School recognises that indicators of child criminal exploitation may present differently for some pupils. Communication difficulties, dependency on adults, limited understanding of risk, social vulnerability and difficulties recognising coercive or exploitative relationships may increase susceptibility to exploitation. Staff will consider a pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs when assessing concerns and determining appropriate safeguarding responses.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange

for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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

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

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

Staff will remain alert to local contextual safeguarding risks within the Croydon area and will follow Croydon Safeguarding Children Partnership procedures where concerns regarding child criminal exploitation arise.

Child-on-child abuse (including harassment and violence)

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

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

All pupils at St Giles School have SEND. Staff recognise that pupils with PMLD, SLD and complex needs may experience additional barriers to recognising, understanding, communicating or reporting abuse and may be more vulnerable to bullying, exploitation, coercion and neglect. Staff will consider a pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs when assessing concerns and determining appropriate safeguarding responses.

Domestic abuse

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

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

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

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for [information sharing](#).

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

Staff recognise that pupils with complex communication and learning needs may experience additional challenges in understanding, expressing or disclosing the impact of domestic abuse. Changes in behaviour,

emotional wellbeing, presentation, attendance or engagement may be indicators that further support or safeguarding intervention is required.

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Staff will remain alert to behavioural, physical and emotional indicators of concern for pupils who are unable to communicate verbally.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

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

Staff recognise that some pupils with SEND may have limited understanding of consent, coercion, relationships and personal autonomy, and may be more reliant on family members and carers. These factors may increase vulnerability and will be considered when assessing concerns relating to forced marriage.

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- Terrorism** is an action that:

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

When considering concerns relating to radicalisation, staff will take account of pupils' communication needs, developmental stage and level of understanding. Staff will not make assumptions based solely on behaviour, communication differences or learning difficulties.

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

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

Further information on the school's measures to prevent radicalisation is set out in other school policies and procedures, including the Safeguarding and Child Protection Policy, Online Safety Policy, Behaviour as Communication Policy, Relationships and Sex Education (RSE) Policy and SMSC Policy, through which British Values, online safety, personal development and positive relationships are actively promoted

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his 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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes 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 to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity 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 child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

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

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEND and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the potential role of misogyny and misandry in harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

As a special school for pupils with PMLD, SLD and complex needs, St Giles School recognises that some pupils may experience additional barriers to recognising, understanding, communicating or reporting harmful sexual behaviour, sexual harassment or sexual violence. Some pupils may have a limited understanding of relationships, consent, personal boundaries, privacy and appropriate sexual behaviour.

Staff will consider a pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs when assessing concerns and determining appropriate safeguarding responses.

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

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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

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

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

As a special school for pupils with PMLD, SLD and complex needs, St Giles School recognises that indicators of serious violence or vulnerability to serious violence may present differently for some pupils. Communication difficulties, social vulnerability, dependence on others for support and a limited understanding of risk may make it more difficult for some pupils to recognise, avoid or report concerning situations. Staff will consider a pupil's age, developmental stage, communication needs, level of understanding, capacity and SEND needs when assessing concerns and determining appropriate safeguarding responses.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors must report to reception on arrival and sign in using the school's Inventory visitor management system. Visitors must not arrive unannounced and entry will only be permitted where a prior appointment has been arranged. As part of the sign-in process, visitors are required to read the safeguarding information displayed on the Inventory system and confirm that they have understood and agree to comply with the school's safeguarding and visitor procedures before entry to the school is permitted.

Visitor records will be maintained through the school's Inventory system in accordance with the school's data protection and record-keeping procedures.

Visitors must provide appropriate identification and any required safeguarding documentation at reception. Verification of photographic identification, DBS information and visitor suitability will only be undertaken by the **HR Officer or HR Manager**.

HR staff will provide the Admin Team at reception with an electronic list of authorised personnel and ensure that this is kept up to date.

Visitors attending the school in a professional capacity, including Local Authority educational psychologists, therapists, social workers, local authority officers, school improvement partners and visiting speakers, will be required to provide photographic identification and either:

- An enhanced DBS certificate dated within the previous three years, which will be checked alongside their photographic identification; or
- Prior written confirmation from their employer or organisation that the appropriate safer recruitment and DBS checks have been completed.

Staff arranging the visit must ensure that reception and relevant staff are informed in advance of the visitor's arrival and that all required documentation has been requested prior to the visit.

Where a member of staff has arranged a visit but the visitor is unable to provide the required identification, safeguarding documentation or evidence of the necessary checks on arrival, they may not be permitted to enter the school until the required documentation has been reviewed and approved.

Where the required identification or safeguarding documentation cannot be provided, the visitor may not be permitted to enter the school until the necessary checks have been completed.

Visitors who have provided satisfactory identification and for whom all required safeguarding checks have been verified by the HR Officer or HR Manager will be issued with a green lanyard.

Green lanyards are issued by reception and indicate that all required checks have been completed and verified. Visitors wearing a **green lanyard may move around the school unaccompanied** where this is appropriate to the purpose of their visit.

Visitors whose safeguarding checks have not been verified, or who are otherwise required to be supervised, will be issued with a **red lanyard** and **must be accompanied by a member of staff at all times whilst on school premises**.

No visitor will be granted unsupervised access to pupils unless the required safeguarding checks have been verified.

Escorted Visits

Visitors issued with a red lanyard must remain under the supervision of a designated member of staff at all times whilst on school premises (usually the member of staff who arranged for them to attend). The member of staff arranging the visit is responsible for ensuring appropriate supervision is in place throughout the visit. Red lanyard holders must not be left alone with pupils or permitted to access areas of the school unsupervised.

Lanyards must be worn and visible at all times.

Staff are expected to challenge any visitor who is not displaying appropriate identification.

Staff must also challenge any visitor wearing a red lanyard who is not accompanied by a member of staff and escort them back to reception.

All staff share responsibility for maintaining a safe environment and are expected to challenge appropriately in order to keep our vulnerable pupils safe.

Visitors will not be permitted to use personal mobile phones whilst moving around the school. Mobile phones and personal devices must remain out of sight unless specific permission has been granted by a member of the Senior Leadership Team.

Visitors who arrive without a pre-arranged appointment will not be permitted to enter the school and will be referred by the Admin Team at reception to the HR Officer or HR Manager.

Refusal to Comply with Visitor Procedures

The school reserves the right to refuse entry to any visitor who does not comply with the school's safeguarding and visitor procedures. This includes refusal to provide appropriate identification, safeguarding documentation or photographic identification, refusal to wear a visitor lanyard, refusal to sign in using the Inventory system, failure to follow staff instructions, or refusal to comply with restrictions relating to the use of mobile phones and personal devices. Where appropriate, the visitor will be asked to leave the premises.

DBS and Safeguarding Documentation

Where a visitor is required to provide evidence of DBS clearance and their DBS certificate is more than three years old, cannot be verified, is unavailable, or the required safeguarding documentation cannot be produced, they will not be issued with a green lanyard.

The school will determine whether the visit can proceed under appropriate supervision with a red lanyard or whether the visit should be postponed until the necessary checks have been completed and verified by the HR Officer or HR Manager.

Where there are safeguarding concerns regarding a visitor's suitability, access to the school site will be refused and the matter will be referred to the Headteacher and Designated Safeguarding Lead (DSL) as appropriate.

Visitors must follow all instructions given by staff regarding pupil confidentiality, medical needs, safeguarding and movement around the school site.

Visiting Speakers / Guests

The school will not invite any speaker or permit any organisation to use school facilities where there are concerns that extremist views may be promoted or where pupils or staff could be exposed to radicalisation.

Appropriate checks will be undertaken before any visit takes place.

Visiting speakers will be required to provide photographic identification on arrival and comply with the school's visitor procedures.

Staff arranging the visit must ensure that reception and the Headteacher or Deputy Headteacher have been notified in advance of the speaker's attendance and that any required safeguarding documentation has been obtained and reviewed.

Non-collection of children

If a pupil is not collected at the end of the school day, staff will follow the school's non-collection procedures.

Reasonable attempts will be made to contact parents/carers and emergency contacts. The pupil will remain supervised by appropriate staff at all times.

Where the school is unable to contact a parent/carer or emergency contact, or where there are safeguarding concerns, advice will be sought from Children's Social Care and/or the police as appropriate.

As a special school for pupils with PMLD, SLD and complex needs, staff will take account of a pupil's communication needs, medical needs, mobility requirements and emotional wellbeing whilst arrangements are made for their collection. Appropriate supervision and support will be maintained throughout.

All incidents will be recorded on CPOMS and reported to the DSL.

Missing pupils

Our procedures are designed to ensure that a missing pupil is located and returned to safe supervision as quickly as possible.

If a pupil is unaccounted for, staff will immediately:

- Inform a member of the senior leadership team and the DSL.
- Search the school site and any locations where the pupil may reasonably be expected to be.
- Check transport arrangements, therapy areas and any off-site activities.
- Contact parents/carers where appropriate.
- Contact the police immediately where there is reason to believe the pupil may be at risk of harm or where the pupil cannot be located promptly.

Staff recognise that pupils with PMLD, SLD and complex needs may be particularly vulnerable if they become missing due to communication difficulties, medical needs, mobility needs, sensory differences or limited awareness of danger. Any missing pupil incident will be treated as a safeguarding concern and responded to with urgency.

All incidents will be recorded on CPOMS and reviewed to identify any lessons learned or additional control measures required.

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a child from a parent, carer or person with lawful responsibility for the child.

Community safety incidents may include suspicious behaviour by adults, attempted abductions, unwanted approaches to children or concerns regarding pupil safety within the local community.

All staff will remain alert to community safety incidents occurring in the vicinity of the school, during educational visits, whilst travelling to and from school, or whilst using school transport arrangements.

As a special school for pupils with PMLD, SLD and complex medical needs, St Giles School recognises that some pupils may be particularly vulnerable due to communication difficulties, limited awareness of danger, social vulnerability, dependency on adults, complex medical needs, mobility difficulties and a reliance on others for personal care and support.

Any concerns relating to child abduction, suspicious behaviour towards pupils or community safety incidents will be reported immediately to the DSL. The school will work closely with parents/carers, the police, Croydon Children's Social Care and other relevant agencies where concerns arise.

Modern Slavery

Modern slavery is a serious form of exploitation and includes slavery, servitude, forced or compulsory labour and human trafficking.

Children may be trafficked or exploited for criminal activity, sexual exploitation, domestic servitude, financial gain or other forms of abuse. Modern slavery can affect children of any age, gender or background.

Modern slavery may overlap with child criminal exploitation (CCE), child sexual exploitation (CSE), county lines activity and other forms of abuse.

Staff will remain alert to indicators that a child may be at risk of modern slavery, trafficking or exploitation and will report concerns immediately to the DSL.

As a special school for pupils with PMLD, SLD and complex medical needs, St Giles School recognises that communication difficulties, dependency on adults, social vulnerability, limited understanding of risk and reliance on others for personal care and support may increase vulnerability to exploitation and make it more difficult for some pupils to recognise, understand or report abuse.

Any concerns that a pupil may be a victim of trafficking, modern slavery or exploitation will be treated as a safeguarding concern and referred immediately to Children's Social Care, the police and other relevant agencies as appropriate.

Virginity Testing and Hymenoplasty

Virginity testing and hymenoplasty are harmful practices and forms of violence against women and girls.

Virginity testing involves examining a female's genitalia to determine whether she has had sexual intercourse. There is no scientific basis for this practice.

Hymenoplasty, sometimes referred to as hymen reconstruction surgery, is a procedure intended to create the impression of virginity.

Virginity testing and hymenoplasty are illegal in the UK and are recognised as forms of abuse, coercion and so-called honour-based abuse.

These practices can have significant physical, emotional and psychological consequences and may place children and young people at risk of further abuse, including forced marriage, domestic abuse, coercive control and family or community pressure.

Staff should remain alert to concerns that a pupil may be at risk of, or have experienced, virginity testing or hymenoplasty.

As a special school for pupils with PMLD, SLD and complex medical needs, St Giles School recognises that some pupils may have limited understanding of consent, bodily autonomy, relationships and personal boundaries. Some pupils may also be reliant on others for personal care, intimate care, communication and daily support, which may increase vulnerability to coercion, control, manipulation or abuse.

Any concerns relating to virginity testing or hymenoplasty will be treated as a safeguarding concern and reported immediately to the DSL. The DSL will follow local safeguarding procedures and seek advice from Children's Social Care, the police and other relevant agencies as appropriate.

Cyber Crime

Cyber crime is criminal activity committed using computers, digital devices, networks or the internet.

Cyber crime can include unauthorised access to computer systems (hacking), online fraud, malware, identity theft, phishing, financial scams and the malicious use of digital technology.

The school recognises that cyber crime can be linked to safeguarding concerns, exploitation and online harm. Pupils may be vulnerable to coercion, manipulation or exploitation through online activity and digital platforms.

Staff will remain alert to signs that a pupil may be involved in, or vulnerable to, cyber-related offending or online exploitation and will report concerns to the DSL.

As a special school for pupils with PMLD, SLD and complex medical needs, St Giles School recognises that some pupils may have limited understanding of online risks, privacy, digital safety and the consequences of online activity. Some pupils may also rely heavily on adults to support their access to technology and online environments. Staff will consider a pupil's communication needs, developmental stage, level of understanding, capacity and SEND needs when assessing concerns and determining an appropriate safeguarding response.

Any concerns relating to cyber crime will be managed in accordance with the school's safeguarding procedures, Online Safety Policy and relevant statutory guidance.