Keeping Children Safe Policy

Approved by:	Interim Executive Board
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St Mary's C of E Primary School will publish our safeguarding and child protection policy on our website. Hard copies will be available on request from the school office.

achieving for children

Kingston and Richmond Safeguarding Children Partnership

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1. Introduction and policy aims

St Mary's C of E Primary School has a duty to keep children safe. This includes how we protect children from harm and how we respond when we suspect or confirm that a child is being harmed. Children are at the centre of everything we do at St Mary's C of E Primary School. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. Adults in our school know that keeping children safe is everybody's responsibility and that all children regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion, and home circumstances have equal rights to protection and opportunities.

We aim to:

- do all we can to prevent children from coming to harm
- provide quality training to our staff so they are able to recognise potential signs of abuse, neglect and exploitation, understand what their responsibilities are and how they should respond when they identify a concern
- communicate transparently and honestly when there is a concern about a child with all those involved, including parents, other children and staff, where it is safe and appropriate to do so
- share information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time

2. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home or online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop

Child protection means the processes carried out to protect children who have been

identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, Interim Executive Board (IEB) members, supply staff and self-employed staff.

Safeguarding team is used here to refer to the designated safeguarding lead (DSL) and deputy DSL(s) as a whole. The DSL is the member of the senior leadership team who has the lead responsibility for safeguarding and child protection (including online safety).

Child means anyone under the age of 18.

Parent means birth parents or other adults who are in a parenting role, for example guardians, step-parents, foster carers and adoptive parents.

Statutory means that we have to follow what has been decided or is controlled by the law and government guidance.

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Our safeguarding arrangements are guided by and align with the KRSCP's local arrangements and London Child Protection Procedures and Practice Guidance, sometimes referred to as local safeguarding arrangements in this policy.

3. Key personnel

Key individuals and agencies

Designated safeguarding lead (DSL)	Emily Evans
Deputy DSLs	Clare Quinn, Susanna Campos
Designated teacher for children looked after	Clare Quinn
Designated teacher for young carers	Clare Quinn

SENCO	Clare Quinn
Chair of IEB	Rosemary Hafeez
Safeguarding link IEB	Jenny Gresson
Local authority children's services:	**Kingston and Richmond** Website: Single Point of Access (SPA) Telephone: 020 8547 5008 Out of hours (emergency): 020 8770 5000
Kingston and Richmond's local authority designated officer (LADO) service	Email: LADO@achievingforchildren.org.uk Telephone: 07774 332675 Online: LADO referral form
Kingston and Richmond Safeguarding Children's Partnership (KRSCP)	Email: lscb-support@kingrichlscb.org.uk

4. The law (legislation) and statutory guidance

Among other things, the Education Act 2002 places a duty on schools to keep children safe and promote their welfare. This policy is informed by statutory guidance and legislation including but not limited to the Keeping children safe in education statutory guidance (KCSIE), Statutory framework for the early years foundation stage (EYFS), Working Together to Safeguard Children statutory guidance and Prevent duty guidance.

5.Roles and responsibilities

Everybody in our school has a responsibility for safeguarding, but some staff members have specific safeguarding roles. An overview is listed below, but it is not exhaustive.

The Governing Board (IEB)

KSCIE and non-statutory Maintained schools governance guide sets out the roles, responsibilities and legal duties for governing boards. The board is responsible for ensuring that:

- safeguarding and the child's best interests, wishes and feelings, are considered in everything the school does
- there is a whole school approach to safeguarding that everyone is involved in and online safety is a theme throughout
- school policies, procedures and training follow the law and align with the local safeguarding children partnership's arrangements
- the school's leadership team is held to account for the impact and success of the

school's safeguarding arrangements

- a safeguarding self-audit is submitted to the KRSCP annually that is reviewed by the board
- they appoint a DSL with the appropriate skills and experience who is given the additional time, funding, training, resources and support needed for the role
- they appoint a designated teacher for looked after children
- they appoint an experienced IEB member to take leadership responsibility for safeguarding on behalf of the board
- all staff have the relevant skills, training and awareness to keep pupils safe
- all IEB members receive appropriate safeguarding training at induction, which is regularly updated, and have read the full KCSIE guidance
- they monitor how the school is supporting its pupils with regard to their protected characteristics
- there are effective and robust safer recruitment practices in place
- the school works with external agencies to safeguard children and promote their welfare by sharing information and taking appropriate action in a timely manner
- child protection files are maintained as set out in Annex B of KCSIE
- there are procedures for preventing, reporting and managing safeguarding concerns about adults who work or volunteer at our school
- children are taught how to keep themselves and others safe, including online
- strong IT systems are in place, including filtering and monitoring systems that limit children's exposure to online risks from the school's IT system and cyber security systems that protect children's personal information
- arrangements are in place to keep children safe when the site is being hired/let

The safeguarding link IEB member (and their deputy) - Jenny Gresson

- acts as the board's safeguarding specialist
- has received the appropriate training to equip them with the skills to identify if there are areas of weakness in our safeguarding arrangements and drive improvement
- regularly visits the school, meets with the safeguarding team and collects evidence to test and assure the board that our safeguarding policies and procedures effectively keep children safe

The headteacher - Emily Evans

- has day-to-day responsibility for the school, which includes responsibility for safeguarding
- is a member of the safeguarding team meeting regularly with the DSL to keep on top of safeguarding issues and enquiries
- ensures there is a well-equipped safeguarding team to cover the DSL's responsibilities if the DSL is absent or unavailable
- makes sure that staff are recruited safely and receive a good induction and training
- becomes the 'case manager' when a staff member's behaviour raises concerns about their suitability to work with children and keep them safe
- ensures the school's safeguarding policies and procedures are understood and followed by all staff
- works with the DSL to create a culture of openness and regular opportunities for pupils, parents and staff to share their views and shape how the school keeps pupils and staff safe
- updates the board on how well we are keeping children safe, what safeguarding issues children are facing and how we are addressing concerning trends
- enforces a mobile phone-free environment for pupils by default
- addresses issues with site security and develops the school's response to critical incidents and external threats to the school

The designated safeguarding lead (DSL) - Emily Evans

- is always available during school hours for staff to discuss any safeguarding concerns and is the point of contact for safeguarding partners
- arranges appropriate cover for any out of hours/out of term activities
- links with KRSCP to keep up to date with the local safeguarding arrangements and training offer, and attends the termly KRSCP DSL forum
- refers safeguarding concerns to appropriate and relevant external agencies in line with data protection laws, supporting staff who make referrals directly
- develops staff's expertise, provides them with advice and support and may consult with them and wider professionals when deciding whether to make a referral
- keeps the headteacher informed of safeguarding issues
- works with the headteacher to promote the educational outcomes for children who

have involvement from safeguarding partners and reduce the increased risk of harm to vulnerable children

- works with the 'case manager' and LADO for child protection concerns that involve a staff member
- contributes to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions and meetings between multiple agencies
- works together with families who may be facing challenging circumstances and makes the school's parent community aware of our duty to make a referral to children's services when a child is at risk of or has experienced harm
- encourages a culture of listening to children, taking into account their wishes and feelings when any plans or measures are put in place to protect them
- makes sure child protection files are kept up to date and transferred appropriately
- works with the board to review this policy annually, submit an annual self-audit to KRSCP and review the effectiveness of the school's safeguarding arrangements
- making sure that adults who work in or for the school have an adequate safeguarding induction and regular safeguarding training, including an understanding of this policy and wider local safeguarding procedures

A deputy designated safeguarding lead(s) - Clare Quinn (Susanna Campos and Tom Charlton have also completed Level 3 safeguarding training)

- supports the DSL with their role and will deputise on the DSL's responsibilities if they are unavailable or absent

More details of the DSL's and deputy DSL's responsibilities can be found throughout this policy, in Annex B of KCSIE and their job descriptions.

All school staff

- know it is everybody's responsibility to create a culture and provide a safe environment for children to learn and speak out about their concerns
- will attend regular training and are expected to request additional training so they understand how to keep children safe and identify when they may be unsafe
- will follow the school's procedures for reporting safeguarding concerns quickly and confidentially asking for support from the DSL if they are unsure
- will, where necessary, refer or support a referral of safeguarding or child protection concerns to external agencies, such as the police, children's services or the LADO

IT provider

- maintains the school's filtering and monitoring systems
- provides filtering and monitoring reports to the senior leadership team
- completes actions in response to concerns, incidents or checks to the system

6. Managing safeguarding concerns about a child

Identifying a child who may be in need of support or protection

It is essential that children can tell us how they are feeling and know we will take their concerns seriously. We aim to create an environment full of 'reachable moments' that encourages children to feel safe enough to open up about their concerns. St Mary's C of E Primary School has systems in place for children to confidently report abuse. Children are regularly reminded of these systems, including through the curriculum, assemblies and posters around the school site. Children can confidently report any worries they have by:

- speaking to a safe adult
- peer mentors

St Mary's C of E Primary School knows that disclosing harm requires immense courage, making a positive first interaction with a safe adult crucial. Staff are trained to handle disclosures sensitively and non-judgementally. They will reassure the child that they have done the right thing, while explaining they cannot promise secrecy if it impacts their safety or wellbeing as information must be shared with those who can help. Staff know the importance of sharing any information that might help build a picture of what is happening for a child, no matter how small the concern may seem, only involving those who need to be involved.

Disclosures are only one method used to identify children who may be in need of support or protection. Staff are trained to stay alert to other indicators like shifts in behaviour, attendance, or physical and emotional wellbeing. Monitoring behaviour and presentation is particularly vital for pre-verbal children or those with communication differences for us to understand their lived experience. We adopt a safeguarding-first approach to behaviour concerns, considering if the child is communicating an unmet need or whether they are experiencing harm.

Responding to concerns about a child's welfare

Staff know the importance of identifying and sharing concerns as soon as a problem becomes visible so we can provide support to families to reduce the chance of a problem getting worse. We are aware any child may benefit from early help, but staff who work directly with children will be particularly alert to circumstances that potentially increase the need for early help.

Staff will follow this policy if they have a concern about a child, speaking to a member of the safeguarding team as soon as is practically possible. We clearly advertise the names of the DSL and deputy DSLs around the school. A member of the safeguarding team should always be available for staff to discuss safeguarding concerns. We will have cover arrangements in place if the DSL is unavailable due to illness, leave or other circumstances. Our confidential shared safeguarding inbox that is only accessible to the safeguarding team makes sure there is no delay in receiving, monitoring or acting upon safeguarding concerns.

Staff will record a written account of their concern on a purple concern form and this will be recorded on CPOMs by the DSL. The DSL will decide on the appropriate course of action based on locally-set thresholds and with guidance from the neglect toolkit where neglect is suspected. The options available to them include arranging community-based early help support, requesting targeted early help level support from the local authority's Family Help service, or making a referral to statutory children's services for child in need (CIN) or child protection support. The police will also be contacted if necessary. We have a duty to share information and work together with relevant external agencies to ensure a child's safety and welfare.

The school may take the lead in organising non-school services to provide early help support for the family. Early help support will be kept under constant review. We will consider making a referral to children's services if the child's situation doesn't appear to be improving or is worsening, however we will continue to provide support and contribute to assessments and plans organised by children's services.

If we believe that a family needs targeted early help to meet multiple and/or complex needs we will recommend to the family that they accept support from the local authority's Family Help team where a qualified lead practitioner will put a plan in place to support the family. Early help services require the family's consent to receive support and their services.

We will make an immediate referral to children's services, and if appropriate the police, where we believe a child is suffering, or is likely to suffer from harm. The safeguarding team will seek advice from children's services whenever they are unsure if the threshold for a referral has been met. If a referral is needed then a member of the safeguarding team should make it. Referrals to children's services will be made through the relevant local authority's procedures who will then make a decision about next steps and the type of response required. The police will notify the school of any domestic abuse incidents they attend that concern a pupil under the Operation Encompass duty.

We will call the police on 999 if we believe an individual is in immediate danger. The school will also inform the police if we become aware that a crime has been committed. We are aware that children can be criminalised for actions they take whilst under coercion, such as actions they take while being exploited, abused or trafficked. We will

treat these children as victims recognising that they are also vulnerable and experiencing abuse. Staff will report concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team who will assess the risk, take appropriate action and, depending on the risk, put a safety and support plan in place. St Mary's C of E Primary School will follow the local School Related Weapons or Potential Weapons Incidents Protocol.

If in exceptional circumstances the DSL is unavailable for staff to report a concern, staff will not delay taking appropriate action. Instead, they will inform another member of the senior leadership team (SLT) or themselves seek advice from children's services. Anyone, including children, can make a referral. If for whatever reason a staff member thinks a referral to children's services is appropriate but hasn't been made, they will consult with them and make a referral themselves. In these circumstances, any action taken by that staff member will be shared with the safeguarding team as soon as is practically possible.

If after a referral, we are dissatisfied with the response from our safeguarding partners and/or the child's situation does not appear to be improving, the referrer will press for re-consideration to ensure their concerns have been addressed and, most importantly, the child receives the support they need. The safeguarding team will use the local resolving professional differences procedure where necessary. The safeguarding team meets regularly to monitor children who we are concerned about to make sure each child's situation is improving in good time and the right support is in place to meet their needs and address our concerns.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. We ask our staff to approach our safeguarding team if they need any support during or following a safeguarding incident.

Confidentiality and information sharing

Personal information about children and their families will be processed fairly, lawfully, and securely. Data protection laws tell us how to protect personal data and give us legal powers to share information to keep children safe and promote their welfare. Staff receive regular data protection training where we make them aware of their duty to receive and share safeguarding information confidentially. This means only with professionals who need to know to keep the child safe, such as the DSL, children's services or the police.

We'll share important information as soon as possible whether that's within the school or with outside partners, such as children's services, so we can quickly get the right support sorted out. We work transparently with parents wherever possible, informing them of our duty to share information and refer suspected abuse or neglect to external agencies. While we seek consent from parents when safe and appropriate, we will share information without consent if necessary to safeguard a child, such as when obtaining consent is impossible, cannot be reasonably expected, or would place the child at risk.

Record keeping

The DSL is responsible for keeping detailed, accurate and secure written records of safeguarding concerns, discussions, decisions made (including the rationale for those decisions), and the outcome. This will include instances where the decision is made that a referral to another agency is not necessary. Safeguarding concerns and referrals are kept in a separate safeguarding file for each child. Access is limited to those who need it.

When a child leaves St Mary's C of E Primary School, the DSL will ensure their safeguarding file is transferred to the new school or college separately from their main file and within 5 days for an in-year transfer or within 5 days of the start of a new term. A confirmation of receipt will be kept. Where appropriate, the DSL will share additional information in advance of a child leaving, particularly where the information would support an assessment of risk to others as well as the individual pupil and help the setting put in place the right support.

When a child starts our school, we will review any safeguarding information provided making sure key staff are aware of the risk and need as soon as possible. If St Mary's C of E Primary School is the last school that the child attends, we will securely store their safeguarding file until their 26th birthday is reached, when it will be securely disposed of.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as ‘cutting' or female ‘circumcision’. FGM is illegal in England. As with other safeguarding concerns, staff will speak to the safeguarding team if they suspect that FGM has been carried out on a child or believe that the child is at risk of FGM. If a teacher (i.e. an individual who is employed or engaged to carry out teaching work in our school) comes to know in the course of their work that a child has experienced FGM they must directly report it to the police. Failure to do so will result in disciplinary sanctions.

Concerns about extremism and radicalisation

St Mary's C of E Primary School complies with the Prevent duty, a legal requirement that obligates agencies including schools to prevent people from becoming terrorists or supporting terrorism. We recognise our role in protecting individuals from extremist ideologies and intervening early to prevent radicalisation. The school undertakes a Prevent duty risk assessment to assess the risk of children being drawn into terrorism, including online, which is informed by the local profile and context.

Protecting children from extremism and being drawn into terrorism is treated the same as any other safeguarding harm. Staff will be alert to changes in a child’s behaviour which could indicate that a child may be in need of help or protection. They will report any concerns in line with the school’s safeguarding procedures detailed above.

The DSL will follow the local Prevent referral pathway where they become aware of a Prevent concern. They may first seek advice from the local council's Prevent lead and children's services. If appropriate, they will make a referral to the police Prevent team who will consider with other agencies whether the child would best be supported under the Channel programme. The DSL will report knowledge of online material promoting terrorism or extremism via the Government's service.

Kingston Prevent referral pathway

Pupils will be provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views. We are responsible for the content and messaging delivered to our pupils. We will ensure that any external speakers, resource materials, or learning tools do not undermine core British values, which include democracy, individual liberty, the rule of law, and mutual respect and tolerance for those with different faiths and beliefs. Promoting these values helps us defend children against extremist ideologies while building a more united and harmonious community.

Concerns about mental health

If staff are concerned that a child's mental health is also a safeguarding concern, they will speak to a member of the safeguarding team as per this policy. We will consider whether support from the Child and Adolescent Mental Health Service (CAMHS) is necessary. If we feel that a child is in danger, we will call 999 or arrange for the child to be taken to A&E immediately by a parent or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, we will seek advice from NHS 111 online or call 111 and select the mental health option.

Child-on-child abuse, including harassment and violence

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen at school, outside of school or online. Staff are made aware of the important role we have to play in preventing child-on-child abuse and responding when we believe a child may be at risk. For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' the instigators, but we make it clear to pupils that all child-on-child abuse is unacceptable behaviour, we will take it seriously and how they can report to us that they have experienced or witnessed it.

We do not downplay any form of child-on-child abuse. Staff are trained to challenge inappropriate behaviour between children that is abusive in nature. Our staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. We all maintain an attitude of 'it could happen here'.

Examples of child-on-child abuse can include, but are not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)

- abuse between children in an intimate relationship (teenage relationship abuse)
- physical assault and harm (including when a child encourages or threatens physical abuse online) or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny/misandry, sexual violence and sexual harassment (such as sexual comments, jokes and online sexual harrassment)
- sharing or making of nude and semi-nude images and/or videos including those generated using AI (deepfakes)
- 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
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals

Child-on-child abuse is preventable. St Mary's C of E Primary School puts measures in place to minimise the risk of child-on-child abuse, including

- ensuring staff are thoroughly trained to recognise the signs that a child is or may be experiencing it, challenge inappropriate behaviour between children and follow the school's procedures for reporting and responding to it
- creating opportunities in and beyond the curriculum to teach children how to keep themselves and others safe, including how to respect each other, deal with conflict and how they can confidently report inappropriate or abusive behaviour
- having a transparent behaviour policy that makes clear our expectations for behaviour and mutual respect, as well as the procedures for responding to unacceptable or abusive behaviour
- regularly analysing safeguarding data on child-on-child incidents to identify emerging risks and trends for pupils, particularly children with protected characteristics, taking action to make the school site safer
- being particularly alert to when children might be at highest risk around the school day (for example immediately after school)
- offering regular opportunities to gather feedback from pupils and their parents about what more we can do to make our school a safer environment for them

Responding to allegations of child-on-child abuse

Staff will report concerns or confirmed incidents of child-on-child abuse using the school's safeguarding reporting and recording procedures described above. The DSL will determine the best course of action from the available options ranging from internal management of the concern to making a referral to children's services and/or the police. We will inform the police if a criminal offence is committed. The police take a welfare approach to children under the criminal age of responsibility who are alleged to have caused harm. The DSL will work closely with the police to ensure the decisions the school makes to protect children and about discipline does not impact the criminal process.

Records will be kept of all concerns, how they were investigated and any outcomes reached on the child's safeguarding file. The DSL will contact the parents of children involved at the earliest opportunity so long as it is appropriate to do so. Where the DSL, children's services and/or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern following our behaviour policy and safeguarding processes.

If a safeguarding risk is established, the DSL will assess the necessity of a safety plan or risk assessment in consultation with the external agencies involved. Individual safety plans will be subject to regular monitoring and will include input from both the pupil concerned and their parents. The course of action taken by the school for each child will be discussed solely with that child's parents.

Child-on-child abuse is a safeguarding issue for both children who display the behaviour and the children who are affected by it. Support will be extended to every child affected by the incident.

Pupils who have been affected by abuse will be supported by:

- Offering an immediate opportunity to discuss the experience with a teacher or member of staff of their choice.
- Reassuring the pupil.
- Offering continuous support.
- Restoring self-esteem and confidence.
- (Where appropriate) Support with rebuilding relationships with their peers, such as Emotional Support sessions, use of mediators or buddies at lunchtimes.

Pupils who have displayed the behaviour will be helped by:

- Discussing what happened.
- Discovering why the pupil became involved.
- Establishing the wrong doing in line with the school code of conduct.

- Informing parents/carers to help change the attitude of the pupil.
- (Where appropriate) Support with rebuilding relationships with their peers in order to move on, such as ELSA support sessions.

Harmful sexual behaviour, including harassment and/or sexual violence

Harmful sexual behaviour exists on a continuum (see diagram below). Our safeguarding team will have a good understanding of harmful sexual behaviour to inform how they respond to concerns, support staff training and work with the PSHE lead to plan the aspects of the curriculum aimed at preventing harmful sexual behaviour. We will always consider harmful sexual behaviour in a safeguarding context. Staff are made aware of the importance of addressing the early signs of inappropriate sexual behaviour, including misogyny, to prevent it escalating into sexual violence and/or sexual harassment.

Hackett continuum of sexual behaviour tool

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviours Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking, or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator Sadism

St Mary's C of E Primary School knows that sexual violence and sexual harassment can happen between two children of any age or sex, online or in person. It can occur also through a group of children to a single child or towards another group of children. We will not dismiss sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”, because this can lead to a culture of unacceptable behaviour,

misogyny, an unsafe environment for children and in the worst case scenario normalise abuse and stop children from coming forward to report it.

Responding to allegations

When responding to harmful sexual behaviour, including sexual harassment and sexual violence, St Mary's C of E Primary School follows the guidance set out in Part Five of KCSIE. We treat incidents that occur online or outside the school setting with the same gravity as in-school incidents. All incidents are responded to using the thresholds set out in the Hackett tool, drawing upon the DSL's professional judgement and following local safeguarding procedures:

Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.

Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.

Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.

Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

Handling cases of harmful sexual behaviour is highly complex. Where appropriate, the DSL will seek the advice of the police and/or children's services to decide next steps and what information can be disclosed to others, in particular the child alleged to have caused harm, their parents and staff. The DSL will also consider which specialist services are best placed to support the children involved.

When assessing incidents of harmful sexual behaviour, we will take into account the ages and developmental stages of the children involved. Any power imbalance between children, such as differences in age, maturity, social status and if any of the children have a disability or learning difficulty, will be taken into account. We will consider whether immediate measures need to be put in place to support and protect the children impacted by harmful sexual behaviour, including witnesses and the child who displayed harmful sexual behaviour.

An immediate risk and needs assessment will be carried out and recorded following a report of sexual violence and on a case by case basis for reports of sexual harassment. The DSL will regularly review the assessment, using it to inform ongoing safeguarding decisions. At all times, we will be actively considering the risks posed to all pupils and staff, and put adequate measures in place to protect them and keep them safe. Our risk assessment will support and be informed by risk assessments carried out by other professionals involved.

Our staff know to reassure any child who reports they have been a victim of sexual violence or sexual harassment that they will be taken seriously, supported and kept safe. We will further reassure those affected that the law exists to protect children, not criminalise them. Experiencing sexual violence and sexual harassment will, in all likelihood, negatively affect a child's educational attainment and be worsened if the child who caused the abuse attends the same school. We will work hard to minimise the impact on their educational outcomes. Wherever possible, the child, if they wish, will be able to continue in their normal routine. Our priority will be to make the child's daily experience as normal as possible, so that our school is a safe space for them.

St Mary's C of E Primary School recognises that children who display harmful sexual behaviour may have experienced their own abuse and trauma. At the same time as considering disciplinary action, we will provide the child with, or find, the right support to stop them from re-offending and address any underlying trauma that may be causing their behaviour. In all scenarios, decisions and actions are regularly reviewed and relevant policies are updated to reflect lessons learnt.

Balancing confidentiality requests with safeguarding duties

The DSL will give the child affected by harmful sexual behaviour as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered. If the child asks for confidentiality and opposes a referral being made to external services, the DSL will assess the situation case-by-case, balancing their wishes against the school's duty to protect them and others. A referral should be made to children's services if a child has suffered harm, faces a risk of harm, or is in immediate danger. Additionally, reports involving crimes such as rape, sexual assault, or assault by penetration should be reported to the police. Decisions to refer against the child's wishes will be handled with care.

If an allegation of sexual harassment or sexual violence enters the criminal justice system, the DSL will have a general understanding of the criminal process, witness support, and the importance of anonymity requirements. Every reasonable effort will be made to safeguard the anonymity of all children involved in a report. This includes evaluating what information staff members need to know and establishing appropriate support. The school will also consider the role of social media in spreading rumours and potentially exposing a child's identity.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person making the allegation needs support or may have been abused by someone else, and this was a cry for help. If so, a referral to local authority children's services may be appropriate. If a report is proven to be deliberately false or malicious, we will consider taking action against the individual in line with our behaviour policy.

Concerns about the sharing or making of nudes or semi-nudes

For the purposes of this policy, 'sharing or making nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves or taken or created by another person. Images may be digitally altered or wholly generated using artificial intelligence, usually referred to as 'deepfakes'.

Our staff will be trained to carefully handle and manage reports of these incidents. Staff reserve the right to confiscate a device in the possession of a child if they have concerns that the device is involved in the sharing or making of nudes or semi-nudes. This is consistent with the Searching, screening and confiscation: advice for schools guidance. Staff will not view, download, forward or delete illegal images of a child. Staff will be aware of what to do when viewing an image is unavoidable.

Incidents will require a proportionate safeguarding response, regardless of whether they are consensual or not, that considers any elements of coercion, exploitation or vulnerability. The DSL will first hold an urgent meeting to establish, among other things, the level of risk to the children involved, if a referral is needed in line with our safeguarding procedures, whether there is a need to view the image to safeguard the child and whether action should be taken to delete or remove the image. The review meeting will likely include the staff member(s) who heard the disclosure and the wider safeguarding team.

The decision to view and delete imagery will be based on the professional judgement of the safeguarding team, guidance from the police (where necessary) and in line with the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance.

The DSL will make an immediate referral to the police and children's services if:

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what they know about the image suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent
- the images involves sexual acts and any child in the images or videos is under 13
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming
- they become aware of a computer-generated explicit image of a child

It will not always be necessary to involve the police or children's services. In these cases, the DSL will be confident that they have enough information to assess the risk to any child involved and that the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support. We may escalate the concern to safeguarding agencies later on as a result of becoming aware of further information or wider concerns.

Discrimination

St Mary's C of E Primary School fosters inclusivity and belonging, creating opportunities to celebrate diversity through our curriculum and activities. We recognise that discrimination can cause trauma and negatively impact a child's wellbeing, sense of belonging, and safety. Taking timely action helps prevent concerns from escalating into bullying and promotes an inclusive and supportive school environment. We have a duty to protect individuals and eliminate unlawful discrimination, harassment, and victimisation, giving this duty specific attention in policy-making and decisions we make about our school.

Some pupils face greater risks of harm or bullying from issues like sexual violence, homophobic, biphobic, transphobic, faith-, or race-based discrimination. Children may be targeted due to their perceived or actual LGBTQ+ identity. We prioritise fostering good relations between those who share protected characteristics and those who do not, ensuring equal opportunities for everyone.

We aim to provide a safe, open space for our community to share concerns. Discrimination is firmly addressed under our safeguarding procedures and behaviour policy, and may involve referrals to children's services and/or the police. We will communicate with parents in line with this policy. Support and check ins will be offered to the pupil who has been targeted. We challenge discriminatory attitudes, making it clear this behaviour is unacceptable. Pupils who discriminate against others have clear consequences and receive the support and education they need to reduce the risk of this behaviour happening again. We report all discrimination incidents, including those not involving children, to the local authority termly.

7. Specific safeguarding considerations

Certain children are at a higher risk of experiencing abuse, whether online or offline, and may face further obstacles in identifying or reporting it. For this reason, there are some circumstances we give a specific safeguarding focus to.

Children who need a social worker

St Mary's C of E Primary School recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm and face additional barriers to attendance, learning, mental health and behaviour. Children may need a social worker to help the family address safeguarding risks or welfare needs. Children's services will tell the school

if a pupil has a social worker. This helps us to make decisions in the child's best interest, such as how we adjust our response to unauthorised absence or the child missing education. We will work with the social worker, the child, and their family when deciding on the extra help we can provide in school to support the child's welfare.

Children looked after and previously looked after

Staff will have the skills and knowledge to keep children looked after and previously looked after safe. We will give appropriate staff the information they need in relation to a looked after child, for example their legal status, who has parental responsibility, who is not permitted to have contact, who is not permitted to know where the child is being educated and the level of decision-making power the local authority has given the carer.

The school's designated teacher for children looked after, Clare Quinn, has the training and experience to understand the unique needs of these children and how they can best be supported to have the same opportunities as their peers. This will include the designated teacher working closely with AfC's Virtual School accessing the training and forums on offer. The designated teacher will also work closely with the children's services and Virtual School involved to put funding to best use to improve the child's educational outcomes. The designated IEB member for children looked after is Rosemary Hafeez.

Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to. We encourage kinship carers of pupils to make the school aware of their caring arrangement so we can establish whether there is any support we can offer or seek advice for.

Private fostering occurs when a child under 16 (or 18 if disabled) is cared for by someone other than a parent or close relative for 28+ days. By law, those arranging this care must notify children's services as soon as possible. If they haven't, the school has a duty to inform children's services, though we also encourage parents to report it.

Young carers

St Mary's C of E Primary School is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, academic achievements, behaviour and wellbeing. We aim to identify young carers early so we make sure young carers receive the right support at the right time by the right services. This may include additional support from safeguarding partners, including the local authority and health services.

Children requiring mental health support

We have an important role to play in supporting the mental health and wellbeing of our pupils. Supporting mental wellbeing is a high priority for our school. With the support of the Mental Health Support Team (MHST), our school's mental health lead, Clare Quinn, has developed a whole school approach to mental health and wellbeing, that aims to build resilience among pupils and get children the right support and advice.

Our staff are aware that mental health problems can develop into safeguarding concerns and can also be an indicator that a child is experiencing or at risk of experiencing harm. Staff are well placed to observe children day-to-day and identify early those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are aware that only appropriately trained professionals should attempt to diagnose a mental health problem.

Children with special educational needs, disabilities and health issues

Our SENCO and DSL work closely together to safeguard children who have special educational needs and disabilities (SEND), particularly when there is a report of abuse. St Mary's C of E Primary School makes sure that staff are aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges, both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical 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 what is happening to them is abuse
- the need for intimate care or that these children are isolated from others, and that these children are more likely to be dependent on adults for care
- issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

We will consider additional pastoral support for these children and ensure we put appropriate measures in place to best support communication. We will make a referral to children's services where an incident highlights that a child might be at increased risk of harm because of their medical condition, for example if the child is repeatedly sent to school without essential medication. Usually, we expect a child's reported medical needs to be verified by UK medical professionals.

Children who are absent from education

St Mary's C of E Primary School recognises issues with attendance can be a warning sign to a range of safeguarding issues and/or worsen existing safeguarding concerns. The school's attendance procedures assist the safeguarding team with identifying and responding to children persistently absent or missing from education, acting early to prevent absent children from becoming a child missing education in the future.

Where a parent expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly important for children who have SEND, a social worker and/or other vulnerabilities.

Children who are gender questioning

This section applies where a child or their parent has requested that the school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition"). The KCSIE guidance states what our responsibilities are in this area and what we should consider when making decisions about a request, particularly in relation to single-sex sport and spaces and residential accommodation. We will keep a clear record of our decision-making.

St Mary's C of E Primary School will balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. We will use our judgment about whether supporting social transition is in the child's best interests and the best interests of other children. We will do this by working together with the child and the child's parents (unless the latter is unsafe to do so), considering clinical evidence or advice and involving the DSL. The DSL will also be involved in cases where a child has socially transitioned but staff and school friends are unaware. We will offer in-school support and signpost to community-based organisations where appropriate or requested.

8. Online safety and the use of smart devices

This section is a summary of the core aspects of St Mary's C of E Primary School's separate online safety policy that sets out our whole school approach, including the use of smart technology (e.g. mobile phones and smart glasses). St Mary's C of E Primary School understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety and the four main categories (4Cs) of online risk when making decisions for our school:

Content: exposure to illegal, inappropriate or harmful content, for example pornography, discrimination, self-harm, suicide, 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, for example peer to peer pressure, and adults posing as children with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, including those generated using AI and online bullying.

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

We have online safety processes in place that aim to protect children and set clear expectations for the acceptable use of technologies and how we will respond to online safety incidents. We fulfil our aims by:

- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to protect children
- making sure children, staff and parents sign an accessible acceptable use agreement that covers our expectations for how they should use the school's IT systems and the consequences for not following the agreement
- educating children to learn how to keep themselves safe when online, what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging parents with keeping children safe online and making parents, children and staff aware that staff can search an electronic device they have confiscated
- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices

Technology and risks and harms associated with it evolve and change rapidly. We will carry out an annual review of the school's approach to online safety, supported by an annual risk assessment that considers and reflects the risks our pupils may face. The school's staff code of conduct and online safety policy details acceptable use of technologies.

Mobile phones and smart technology (including smart devices)

Our school is a mobile phone-free environment meaning children will not have access to their mobile phone (or other smart technology with similar functions) throughout the school day, including during lessons, the time between lessons and breaktimes. There are special circumstances where there are exceptions to this rule, such as if a child requires their mobile phone to monitor a medical need. Staff and visitors are expected to not use

personal devices around children.

Media recordings, including audio, images and videos

We will only take images, videos or recordings of children if we have the child's and parent's consent. We will make sure the child is appropriately dressed. All children are encouraged to tell us if they are worried about any media that has been taken of them. We make careful decisions about how and where we publish images, videos and recordings of children online, recognising the increasing risk that individuals can use artificial intelligence to manipulate the image to cause harm.

Filtering and monitoring systems

Our school has strong and effective filtering and monitoring systems in place to help limit children's exposure to online risks from our school's IT systems. In line with the DfE's Meeting digital and technology standards in schools and colleges guidance, we will make sure that, among other things,:

- we assign a member of the senior leadership team and a governor to oversee filtering and monitoring arrangements and ensure that appropriate systems are in place to meet these standards
- the effectiveness of our filtering and monitoring systems is reviewed at least annually, and more frequently where there is a significant change or issue, led by the designated SLT member responsible for filtering and monitoring, with support from the DSL and our IT support/provider
- we check that filtering works across all internet-connected devices and a record is kept of these checks
- the systems are effective for the number of and age range of our children and consider children who are potentially at greater risk of harm
- specific staff have assigned roles and responsibilities to manage these systems
- staff and pupils know about the systems in place and how to raise concerns
- when we block online content it does not impact teaching and learning
- we have monitoring strategies in place that meet our school's safeguarding needs

Generative artificial intelligence

Generative artificial intelligence (Gen AI) refers to artificial intelligence that creates new content (e.g. text, code and images). Our school is aware that using Gen AI can be hugely beneficial, but also harmful if used inappropriately. We will use the Department for Education's advice and guidance on using Gen AI in education to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line

with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy that can be found on the school's website.

Remote education

We will stay in regular contact with the parent of a pupil being taught remotely, making sure they are aware of:

- the importance of children being safe online and offering advice on how to do so
- what systems our school uses to filter and monitor online use
- what their child is being asked to do online, including the sites they will be asked to access and who from the school their child will be interacting with online

Information security and access management

We understand that cyber security is a safeguarding issue, particularly because we hold sensitive data about pupils and staff. We will take measures to help keep personal information safe, ensuring we have appropriate cyber security systems in place to help protect against cybercrime (i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly). We will follow the government's Cyber security standards guidance. Our systems are reviewed regularly to keep up with the constant changes to cybercrime technologies.

9. Adults who work with children or at our school

Safer recruitment

St Mary's C of E Primary School expects all staff, volunteers and third parties who spend time at our school to share our commitment to keeping children safe. We have tight and robust recruitment procedures in place to deter, identify and prevent people who are unsuitable to work with children from securing employment or volunteering opportunities at our school. We will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. All offers of employment are conditional upon the successful completion of pre-employment vetting checks that are listed in Part Three of KCSIE.

We require written confirmation from third-party and supply staff agencies that they have completed appropriate safer recruitment checks on their employees. We will always check the individual's identification. We will also check the suitability and identification of external visitors and individuals or organisations wishing to hire our site. The headteacher makes the decision on whether a visitor needs to be supervised or escorted.

We will make sure safeguarding arrangements are in place to keep children safe when activities or services that take place on our site are not provided by our school or under the direct supervision or management of our staff, regardless of whether the children

attending are pupils at our school or not. We will end our agreement with the individual or provider if they fail to follow the safeguarding requirements listed in the agreement.

See our separate safer recruitment and lettings policies for full details of these processes.

Extended school and off-site arrangements

We continue to be responsible for the safety and wellbeing of pupils who attend an alternative provision. We know that children who attend alternative provisions often have complex needs and we are aware of the additional risk of harm that these children may be vulnerable to. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision, i.e. checks that we would otherwise perform on our own staff.

We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy. The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement if safeguarding concerns arise and reserve the right to end the arrangement if concerns are not adequately addressed.

Where extended school activities are provided and managed by the school, our own safeguarding policies and procedures apply. When our children attend off-site activities, including work experience placements, we will ensure that effective safeguarding arrangements and thorough risk assessments are in place.

Concerns or allegations about adults in our school

St Mary's C of E Primary School remains vigilant beyond the recruitment and vetting process. We maintain an environment that deters and prevents abuse and challenges inappropriate staff behaviour. This includes creating a culture of openness and transparency so that staff feel comfortable to report staff behaviour that may impact on keeping children safe. The headteacher and chair or IEB will receive training on how to manage allegations against adults working at our school.

Our staff are trained to identify inappropriate or harmful staff behaviour and the procedures to follow if they have a safeguarding concern about an adult at our school. This includes information about appropriate and inappropriate physical contact between staff and pupils and the strict conditions under which it is appropriate to restrict a child's movement, use reasonable force or seclude a child from others for safeguarding purposes in line with the restrictive interventions guidance.

Staff will report low-level concerns (behaviour that sits outside of the staff code of conduct) and allegations (that a member of staff presents a risk to children) to the headteacher as soon as practically possible. This includes concerns that occurred in

school, out of school, online or offline. Staff are always expected to provide a written account of their concern. If the concern is about the headteacher, staff will contact the chair of IEB whose details are at the start of this policy.

If the staff member feels unable to report to the headteacher or chair of IEB, either because they are not available or because they believe that there is a conflict of interest, they will share their concerns with the local authority designated officer (LADO) whose details are at the start of this policy. The LADO is responsible for giving advice and organising the response to concerns that an adult who works with children may have caused them or could cause them harm.

Appendix A sets out the full procedure for managing low-level concerns and allegations of harm.

10. Whistleblowing

All staff will be made aware of the duty to 'whistleblow' certain types of wrongdoing. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Concerns should first be raised with the senior leadership team who will take them seriously.

There are other options available where staff feel unable to raise a concern with the senior leadership team or feel that their genuine safeguarding concerns are not being addressed. For example, they can make contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk). St Mary's C of E Primary School has a separate whistleblowing policy that lists our full procedure. A copy of this can be found in the school's shared policy folder and a printed version is available in the staff room.

11. Site safety

The school has security measures and response plans in place to keep the site secure and help protect children, staff, volunteers and visitors from external threats to the school. School leaders will organise for regular drills, both with and without pupil involvement, to ensure staff are best prepared to manage a critical incident. We will regularly seek the views of pupils, parents and staff to find out if there are areas of the school site where children feel unsafe or at risk of harm.

A member of the senior leadership team will make the police aware if we have information of concern about the local area that could affect pupils' safety. If we are concerned about areas where gangs or anti-social behaviour are present, we will also inform the local authority's contextual safeguarding team.

12. Training

Staff build up expertise by managing safeguarding concerns on a daily basis, therefore

staff have the opportunity to contribute to and shape staff training and this policy. All staff receive core safeguarding and child protection training (including online safety) at induction that is minimally updated every two years or sooner if required. The training provided covers what staff should know as set out in the KCSIE and EYFS statutory guidance. In addition, staff receive regular safeguarding updates (for example, via email, e-bulletins and staff meetings) so they have the information they need to keep children safe, as required and at least annually. Staff sign to confirm they have read and understood Part One of the latest version of KCSIE. Some staff members will be expected to attend additional safeguarding training specific to their roles.

Among other things, staff who may support children in early years will be trained to understand acceptable staff ratios, the role of key persons, safer eating arrangements, appropriate food preparation and management of allergies.

All IEB members receive safeguarding and child protection (including online) training at induction that prepares them for testing and challenging the school's procedures and policies making sure they are working as they should be. Their training will be regularly updated. The safeguarding link IEB member will refresh their knowledge more regularly and receive additional training so they are equipped for their role and stay alert to changes to the safeguarding context. This might include the safeguarding link governor attending the termly AfC safeguarding link governor forum.

The safeguarding team will attend regular training to prepare and assist them in leading the school's safeguarding response and strategy. The board will ensure that the training undertaken complies with Annex B of KCSIE and Annex C of EYFS statutory guidance. Additional training or research may be required as local and school-specific safeguarding issues arise. The safeguarding team will attend level 3 multi-agency local safeguarding training and Prevent awareness training within 12 weeks of starting the role that they will refresh every two years.

We make sure that staff provided by external agencies and third parties, for example supply teachers and contracted staff (including catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

13. Teaching and learning

At St Mary's C of E Primary School, we recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our relationships, sex and health education policy sets out how we do that, making sure the 'keeping safe' curriculum is woven through all aspects of school life and it meets the needs of all children. This curriculum will have flexibility so we can adapt it to cover specific safeguarding issues that arise during the school year. We will vet the external visitors we plan to use to deliver any of this subject's content to ensure they are suitable for our school and align with our safeguarding expectations. They will follow this policy when

managing any disclosures of harm made when delivering this subject.

14. Reviewing our safeguarding processes

At St Mary's C of E Primary School, we regularly review the success of what we are doing to keep children safe. This includes reflecting on what we can learn from safeguarding concerns and incidents taking any action needed to improve our practice. The impact of safeguarding policies, systems and processes is kept under continual review. We are open to challenge and actively seek opportunities to learn how we can improve. For example, we

- regularly seek and listen to the views and experiences of pupils, staff and parents
- utilise safeguarding monitoring visits from IEB members
- report the impact of our safeguarding arrangements to the board
- undergo external safeguarding reviews
- submit an annual self-audit to the KRSCP
- seek external expert advice to help us make decisions
- review the effectiveness of staff training

15. Linked policies

This policy is only one of a range of documents that set out what our safeguarding responsibilities are and how we carry them out. This policy is complimented by and should be read alongside the following policies:

- Positive Relationships (Behaviour)
- Anti-bullying
- Safer recruitment and selection
- Staff code of conduct
- Whistleblowing
- Procedure for managing allegations against staff (including low-level concerns)
- Health & safety
- Attendance
- Supporting pupils with medical needs
- Allergy Awareness
- Online safety
- Intimate Care Policy
- Separated Parents

Appendix A - Managing Low-Level Concerns

Concerns that do not meet the harm threshold (known as low-level concerns)

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.

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.

1. 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

2. 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
- Having a clear, confidential reporting system for staff.
- 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.

3. 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.

4. 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 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.

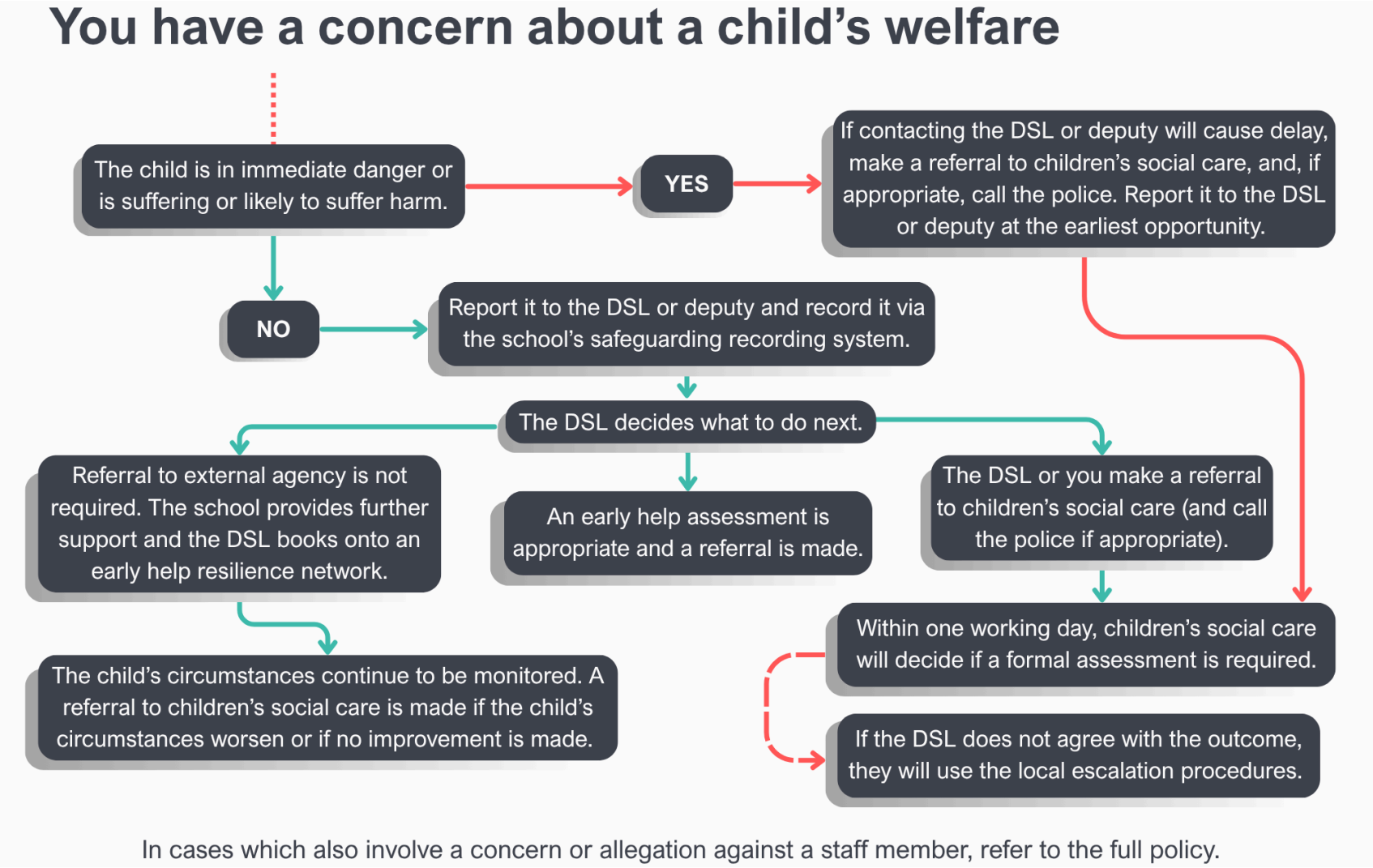
5. References

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.

Appendix B: flowchart for responding to concerns about a child

If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below.



In cases which also involve a concern or allegation against a staff member, refer to the full policy.