OFG Education

SAFEGUARDING POLICY

Bluebank School

Designated Safeguarding Lead – Kam Banga

Safeguarding Governor – Ed Hall



OFG Education

Safeguarding Policy

Contents **Page No.**

1.0 Policy statement 3
2.0 Local Arrangements for the school 6
3.0 What is safeguarding and child protection? 9
4.0 The role of governors, the proprietor and senior managers 12
5.0 Designated Safeguarding Lead (DSL) 15
6.0 Safeguarding Training and Updates for all team members 18
7.0 Roles and Responsibilities of Team Members 20
8.0 Safer Recruitment 24
9.0 Universal and Community-based Early Help and Targeted Early Help 24
10.0 Reporting concerns 26
11.0 Managing Referrals to DBS and professional bodies 27
12.0 Partnership working and sharing information 28
13.0 Child-on-child abuse (including harassment and violence) 29
14.0 Bullying (Please also see the Anti-bullying *Policy and Behaviour Policy*) 33
15.0 Preventative Strategies 34
16.0 Online Safety and Security 35
17.0 Children and young people who are absent from education 36
18.0 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) 37
19.0 Serious violence 39
20.0 'Honour'-based abuse including FGM and Forced Marriage 39
21.0 Preventing Radicalisation and the Prevent Duty 40
22.0 Students requiring support with their Mental Health 41
23.0 Restrictive Interventions and Use of Reasonable Force 42
24.0 Allegations against team members 43
25.0 Low-level concerns 44
26.0 Working with the Local Authority Designated Officer or local equivalent 45
27.0 Whistleblowing 45
28.0 Alternative provision and work experience placements 46
29.0 Digital and Remote Learning 47
30.0 Home visits 48
31.0 Policy Review 48

Safeguarding is everyone's responsibility

All team members who work directly or indirectly with students in our schools and colleges have a responsibility to safeguard their welfare. The following people have specific additional responsibilities with regard to safeguarding and must work together to ensure a consistent approach across the school/college:

Designated Safeguarding Lead (DSL): Kam Banga

Deputy Designated Safeguarding Lead (DSL): Gaynor Black; Ashleigh Taylor

Headteacher/Principal: Kam Banga

Safeguarding Governor: Ed Hall

This policy must be read alongside the Safeguarding set of policies:

- Child Exploitation Policy
- Child-on-Child Abuse Policy
- Harmful Sexual Behaviour Guidance
- Low Level Concerns Policy
- Mobile & Smart Technology Policy
- Protecting Children & Young People from Radicalisation Policy
- Safer Recruitment Policy
- Searching, Screening and Confiscation Policy
- Staying Safe Online
- Web Filtering and Monitoring Policy
- Whistleblowing Policy

Terminology

- "Our teams" and" "team member/s" include everyone working in Outcomes First Group's settings and services in a paid or unpaid capacity, including employees, consultants, agency staff, trainees and contractors. For Blenheim schools, volunteers are included in this definition.
- "Parents and carers" refer to the person or people with legal parental responsibility for the student
- "Students" refers to all children and young people being educated and supported at the setting or service

1.0 Policy statement

We are committed to ensuring that all of our students are effectively safeguarded at all times. This policy sets out how students in our schools and colleges will be safeguarded; it applies when working offline and online, at the educational setting, on visits and off-site activities, and in all virtual communications.

Safeguarding and child protection must always be the highest priority and at the forefront of everything we do. A whole school/college approach is essential to ensure these principles are embedded in all decisions, planning, policy and day-to-day operations and activities.

It is essential that all team members understand their safeguarding responsibilities.

When carrying out our duties to safeguard and promote the welfare of students, our schools and colleges will, at all times, have regard to *Keeping Children Safe in Education (KCSiE) 2026*. This is the statutory guidance that sets out the legal duties that govern all schools and colleges in England educating children.

Where a school or college places a student with an alternative provider, the school/college continues to be responsible for the safeguarding of that student and should be satisfied that the placement meets their needs. Please see the Group's ***Alternative Provision (AP) Policy***.

It is essential that **everybody** working in a school or college understands their safeguarding responsibilities.

Governing bodies and proprietors should ensure that *KCSiE 2026* is read as follows:

- The whole guidance document is read by members of the governing body, the proprietors, school leaders, the DSL and deputy
- All team members working in a school or college, including those who do not work directly with students, must read and understand the entirety of Part one to enable them to safeguard and promote the welfare of students. This is a minimum requirement for team members who work directly with children and young people.

Where the school includes nursery, reception or other provision for children aged 0 to 5, Section 3 of the Early Years Foundation Stage Framework (EYFS) must be read alongside KCSiE.

Working together to safeguard children sets out what individuals, organisations and agencies must and should do to keep children and young people safe and emphasises that effective safeguarding is achieved by putting children and young people at the centre and by every individual and agency playing their part.

All team members working directly or indirectly with students **must** ensure that:

- students feel safe and listened to
- they create an environment and culture in which students feel valued
- the best interests of the student are always considered and acted upon
- safer recruitment procedures (set out in our ***Safer Recruitment Policy***) are rigorously followed
- they understand their roles and responsibilities in keeping students safe through ongoing learning, development and supervision
- they understand that students with special educational needs or disabilities (SEND), certain medical or physical health conditions can face additional safeguarding challenges both online and offline
- they are vigilant in monitoring possible signs of abuse, neglect or exploitation including for those students who have complex learning difficulties or communication needs, who may be particularly vulnerable
- they are aware that children and young people can abuse other children and young people i.e. child-on-child abuse, and must maintain an attitude of **'it could happen here'**

- they follow the appropriate procedures in place for sharing safeguarding concerns, including low-level concerns, and ensure these are shared with relevant professionals in a timely manner
- they understand and implement local safeguarding procedures as set out in local authority arrangements
- students learn about appropriate relationships with adults and their peers and recognise when other people's behaviour is unacceptable or inappropriate
- a zero-tolerance approach is taken to bullying, harassment, violence, abuse, harmful sexual behaviour (HSB), misogyny, misandry, racism, faith-based prejudice, homophobia, biphobia, transphobia, discriminatory behaviour and other inappropriate behaviour
- understand that children and young people's sexual behaviour exists on a wide continuum, ranging from developmentally expected to inappropriate, problematic, abusive or violent. Further information can be found at: Sexual development and behaviour in children | NSPCC Learning

2.0 Local Arrangements for the school

2.1 All team members must be aware of the local arrangements for safeguarding relevant to the school or college in which they work;

2.2 The local arrangements for Bluebank School are as follows:

2.3 Bluebank School safeguarding arrangements are aligned with the local multi-agency safeguarding arrangements:
- The Derby, Derbyshire Children's Safegaurding Partnership (DDSCP) consists of the three safeguarding partners: the local authority, the Integrated Care Board (NHS safeguarding partner), and the chief officer of police for the relevant police force area. The school will co-operate with and act in accordance with the published safeguarding arrangements.
- The Sheffield Children's Safeguarding Partnership (SCSP).

Where a child is from a different county, the school will work with the named local authorities safeguarding processes and procedures.

2.4 The Local Authority Designated Officer contact:
for Derby City is CPMduty@derby.gov.uk
for Derbyshire County is professional.allegations@derbyshire.gov.uk.
for Sheffield City is LADO@sheffield.gov.uk

2.5 All safeguarding referrals must be reported to the local authority

Derby
All enquiries should be directed to the Initial Response Team
Tel: 01332 641 172 (during normal working days between 9am and 5pm)
Non-urgent referrals via the Derby Children's Social Care Online Referral System

Derbyshire
All concerns regarding immediate child protection should be made by telephone to:
Starting Point
Tel: 01629 533 190
All requests for support should be made to Starting Point online at:
Starting Point Contact and Referral Service

Sheffield
If you are worried that a child has been harmed or is at risk of harm then telephone The:
Sheffield Safeguarding Hub on 0114 273 4855 (24 hours) to speak to a social worker. Further guidance is available on SCSP.

If a child is in immediate danger then call 999 for an emergency police response or 111 for a non-emergency.

Further information:
NSPCC
National Helpline
0808 800 5000

Childline
0800 11 11

2.6 The local authority safeguarding referral procedure can be found on the website link here: Derby and Derbyshire Safeguarding Children's Partnership Procedures website and Sheffield Children Safeguarding Partnership.

2.7 For all referrals regarding radicalisation, the Channel/Prevent referral form can be used through the Prevent Strategy in the Derby and Derbyshire Safeguarding Children's Partnership Procedures website. For Sheffield visit SCSP.

2.8 For all referrals regarding exploitation, follow the Derby and Derbyshire Safeguarding Children's Partnership Procedures. For Sheffield visit SCSP.

2.9 The local authority procedure for a community-based Family Help /early help referral is:

Derby

City Locality Based Single Point of Access (SPA) Clerks
Locality 1 and 5
Derwent, Chaddesden, Spondon, Oakwood, Mackworth, Allestree and Darley
Email: vcm1and5@derby.gov.uk
Locality 2
Sinfin, Alvaston, Boulton, Chellaston, Osmaston and Allenton
Email: vcm2@derby.gov.uk
Locality 3 & 4
Balgreaves, Littleover, Mickleover, Normanton and Abbey
Email: vcm3and4@derby.gov.uk
The Light House (Integrated Disabled Children's Service)
Single Point of Access Clerk
Tel: 01332 256990
Email: VCM-IDCS@derby.gov.uk
Early Help Advisors can be contacted via their locality based Single Point of Access Clerks as noted above.

Derbyshire All requests for support should be made to Starting Point online at: Starting Point contact and referral service (Derbyshire County Council Website)

For Sheffield City: EarlyHelpAssessment@sheffield.gov.uk

2.10 The Chair of Governors for Bluebank School is: Ed Hall

2.11 The Group's Director of Safeguarding/Safeguarding Adviser can be contacted at: safeguarding@ofgl.co.uk

2.12 Each school/college should complete an annual safeguarding contextual profile, (which should be completed by the end of the Autumn term) including:

- local safeguarding priorities from the Safeguarding Partnership
- local prevalence of:
  - criminal exploitation
  - county lines
  - child sexual exploitation
  - domestic abuse
  - serious youth violence
  - missing children
  - online harms
  - knife crime
  - radicalisation risks
- local demographic factors
- risks linked to transport routes, town centres, parks, retail areas etc
- trends identified through the school's own safeguarding data
- attendance and persistent absence themes
- child-on-child abuse themes
- bullying trends
- community tensions, hate incidents, or extremism concerns

2.13 The DSL will review the local safeguarding context at least annually and use this information to inform team member training, curriculum planning, supervision levels, risk assessments, and safeguarding priorities.

2.14 The school/college will participate in local safeguarding partnership learning reviews, thematic reviews, safeguarding briefings, and multi-agency training where available.

2.15 The DSL will ensure that local safeguarding practice reviews, child safeguarding practice reviews, and local learning reviews are disseminated to relevant team members and governors.

2.16 Escalation: If professionals disagree regarding threshold decisions, risk level or service provision, the school will use the local safeguarding partnership professional challenge and escalation procedures.

3.0 What is safeguarding and child protection?

3.1 Safeguarding

Safeguarding is the action taken to promote the welfare of children and young people to protect them from harm. This policy includes the safeguarding of young adult learners within our schools and colleges and applies both offline and online.

Safeguarding is fundamental to student wellbeing. We are committed to creating an environment in which every student feels safe, heard, respected and supported, recognising that effective safeguarding is essential to promoting students' wellbeing,

development, engagement and achievement.

Safeguarding is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, 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
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the child's best interests.
- taking action to enable all children to have the best outcomes in line with the Children's Social Care National Framework

3.2 Contextual Safeguarding

We adopt a contextual safeguarding approach to safeguarding and child protection. Contextual safeguarding is: *'...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.'* (Dr Carlene Firmin)

3.3 Child Protection

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

3.4 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, we believe that safeguarding is everyone's responsibility. The Group expects that, without exception, team members keep students at the centre of all that they do and that any actions taken are in the best interests of the students.

3.5 Defining Significant Harm/Child Abuse

3.5.1 The Children Act 1989 introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under Section 47 of the Act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

3.5.2 Under Section 31 of the Children Act as amended by Adoption and Children Act 2002:

'harm' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;

'health' means physical or mental health; and

'ill-treatment' includes Sexual Abuse and forms of ill-treatment which are not physical. Abuse or neglect is not always easy to identify; team members are more than likely to have some information but not the whole picture.

3.5.3 There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm':

- Neglect
- Physical Abuse
- Emotional Abuse
- Sexual Abuse

Financial and economic abuse are increasingly recognised as major safeguarding and wellbeing issues directly impacting children and young people. This type of abuse is where someone controls or exploits another person's money, finances, or access to essential resources to gain power over them and may also be an indicator of wider abuse, neglect, or exploitation.

3.5.4 It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children and young people are at risk of abuse, exploitation and harm online as well as face to face. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life.
- children and young people can abuse other children and young people (child-on-child abuse), this can happen both inside and outside of school and online.

3.5.5 Children and young people can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children, and harm may be perpetrated or facilitated by individuals or groups. Examples of extra-familial harm may include (but are not limited to): criminal exploitation (such as county lines and financial exploitation), serious violence, modern slavery and human trafficking, online harm, sexual exploitation (including group-based child sexual exploitation), child-on-child (non- familial) sexual abuse and other forms of harmful behaviour displayed by children towards their peers, abuse, and/or coercive control, children may experience in their own intimate relationships (sometimes called teenage relationship abuse), and the influences of extremism which could lead to radicalisation.
(Working Together to Safeguard Children)

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. For example, in relation to the impact of domestic abuse on children, 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. (KCSiE 2026)

All team members must be aware of the signs and indicators of abuse, neglect, exploitation and modern slavery, (Please see 7.6 for further information). understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that team members are able to identify cases of children who may be in need of help or protection.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

4.0 The role of governors, the proprietor and senior managers

4.1 Governing bodies and proprietors have a strategic leadership responsibility for their school/college's safeguarding arrangements and must ensure that they comply with their duties under legislation.

They must read the whole KCSiE 2026 statutory guidance document and have regard to it at all times, ensuring policies, procedures and training in their schools and colleges are effective and comply with the law at all times. They must have oversight of the safeguarding policies and procedures and ensure that they are being effectively implemented and that training is effective.

As with all team members, governors must be safely recruited and have all relevant checks on file. Please refer to **section 8.0** of this policy and the Group's ***Safer Recruitment Policy*** for further information.

4.2 Governing bodies and proprietors should:

- Have a senior board level (or equivalent) lead to take **leadership** responsibility for their school's/college's safeguarding arrangements'. The named Governor for the school is Ed Hall
- Ensure that the school contributes to multi-agency working in line with Working Together to Safeguard Children
- Be aware of the local multi-agency safeguarding arrangements
- Receive appropriate safeguarding and child protection training (including online safety) at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in the school/college are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- As part of the whole setting safeguarding approach, they must create a culture that safeguards and promotes the welfare of students in their school or college. The safeguarding culture must be monitored through regular audits, student feedback, team member surveys and an annual self-evaluation of safeguarding

arrangements and effectiveness with evidence of safeguarding assurance activity and impact.

- Ensure that robust recruitment procedures are in place and monitored, in line with the Group's ***Safer Recruitment Policy,*** that deter and prevent people who are unsuitable to work with children and young people from applying for or securing employment opportunities in schools.
- Be committed to ensuring that students' voices are heard and that their lived experiences help shape safeguarding practice, using student feedback, consultation and safeguarding discussions to evaluate the effectiveness of safeguarding arrangements and to inform decision-making, policy development and continuous improvement.
- Be responsible for ensuring an appropriate senior team member, from the school leadership team, is appointed to the role of **DSL**. With the support of governors, proprietors and senior leaders, the DSL should take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. **This should be explicit in the role-holder's job description.**
- Be aware of their obligations under the Human Rights Act 1998 (HRA) and the Equality Act 2010, which require schools to:
  - Act in a way that respects and protects an individual's human rights when they make individual decisions about them. In particular, the right to: education, freedom from inhuman and degrading treatment, and respect for private and family life. These rights must be protected and applied without discrimination.
  - Carefully consider how students are supported with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. Proportionate positive action can be taken to deal with particular disadvantages affecting those with a protected characteristic to meet their specific need. This includes a duty to make reasonable adjustments for disabled students and those with long term conditions.
  - Guidance to help schools understand how to fulfil their duties under the Equality Act (2010) is available on the DFE website: Advice for schools

  - Ensure that students are taught about how to keep themselves and others safe, including online. This education should be tailored to the specific needs and vulnerabilities of individual students.
  - Do all that they reasonably can to limit students' exposure to online risks from the school or college system, including:
    - Ensuring the school has appropriate filters and monitoring systems in place, that are informed in part by the risk assessment required by the Prevent Duty, and that their effectiveness is regularly reviewed.
    - Work closely with senior leaders, the DSL and IT service providers in all aspects of filtering and monitoring.
    - Ensuring that the school/college leadership team and relevant team members have an awareness and understanding of the appropriate online filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Consider the age range and developmental age of their students, the number of students and their needs, how often they access the IT system and the

proportionality of costs versus safeguarding risks.

- Adhere to DfE's Meeting digital and technology standards in schools & colleges that requires schools to:
  - identify and assign roles and responsibilities to manage filtering and monitoring systems.
  - review the effectiveness of filtering and monitoring provision at least once every academic year.
  - block harmful and inappropriate content without unreasonably impacting teaching and learning.
  - have effective monitoring strategies in place that meet their safeguarding needs
    (Please see the ***Web-Filtering Policy)***

- Review the standards and discuss with IT and service providers what more needs to be done to support schools and colleges in meeting this standard. The DfE's Plan technology for your school to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.
- Take measures to protect personal information and ensure appropriate cyber security systems are in place. The Cyber security standards for schools and colleges outline actions that can be implemented to strengthen resilience, reduce the risk of disruption, prevent data breaches, and mitigate safeguarding risks. Further resources can be found at National Cyber Security Centre

  DfE has published Generative AI: product safety expectations and Using AI in education settings: support materials to support schools to use generative artificial intelligence (AI) safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

  Online safety is treated as a rapidly developing and interrelated theme across all areas of school and college life. Please see the ***Staying Safe Online Policy***, and ***Web-filtering Policy*** and the ***Mobile & Smart Technology Policy*** for further information.

4.3 Where there is a safeguarding concern, governing bodies, proprietors and school leaders will ensure the student's wishes and feelings are listened to when determining what action to take and what services to provide. This will be balanced with their duty to protect the victim and other children and young people.

4.4 Where the school/college premises are used for non-school activities and the services or activities are provided under the direct supervision or management of the school/college, the school/college's arrangements for child protection and safeguarding apply. Where services or activities are provided by another body, the school/college must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure they will liaise with the school/college on these matters as appropriate. This applies regardless of whether or not the children and young people who attend any of these services or activities are students on the school roll or college roll.

The governing body or proprietor must also ensure safeguarding requirements are included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

DfE provide guidance on:

- Out-of-school settings: safeguarding guidance for providers details the safeguarding arrangements that schools and colleges should expect these providers to have in place.
- Using after-school clubs, tuition and community activities provides information for providers, parents and carers.

In the event of an allegation being received relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children. As with any safeguarding allegation, the school/college must follow the safeguarding procedures set out in this document, including informing the Local Authority Designated Officer or local equivalent, where appropriate.

5.0 Designated Safeguarding Lead (DSL)

5.1 With the support of the governing body and proprietor, the Headteacher/ Principal must appoint one individual to be the lead DSL and make arrangements for there to be a deputy DSL who will manage any immediate safeguarding incidents in the DSL's absence.

The DSL must be an appropriate senior member of the leadership team and, along with deputies, undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years and will include Prevent awareness training, updates on online safety, filtering and monitoring, information sharing, AI-related risks, mental health, SEND, harmful sexual behaviour, serious violence, and local safeguarding arrangements.

5.2 The DSL (or deputy) must always be available during school hours for team members to discuss any concerns.

5.3 The Headteacher/Principal must ensure that:

- job descriptions for the DSL and Deputy DSL are kept on personnel files and clearly state their responsibilities.
- robust cover arrangements are in place whenever the DSL is unavailable through illness, leave or other circumstances to ensure that concerns are received, monitored and acted on without delay at all times.

5.4 The main responsibilities of the DSL are to:

- provide support to team members regarding safeguarding concerns
- lead on advising team members of any action to be taken due to a safeguarding concern and ensure they know the cover arrangements when the DSL is unavailable
- ensure that students are immediately safeguarded from harm and abuse

- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries
- adopt a child-focused and holistic approach ensuring the student's wishes and feelings are taken into account when determining what action to take
- Make referrals as appropriate, including referring:
  - allegations to the Local Authority Designated Officer or local equivalent
  - safeguarding concerns to placing and host local authorities
  - suspected cases of radicalisation to Channel
  - suspected case of FGM, Child Sexual Exploitation and trafficking to the police
  - support the Headteacher/ Principal to ensure cases are reported to DBS or equivalent where a person in regulated activity, has been removed from regulated activity, dismissed, redeployed, suspended, resigned or would have been removed because they may have harmed a child, posed a risk of harm, satisfied the harm test, or been cautioned or convicted of a relevant offence;
  - liaise with the Director of Safeguarding/ Safeguarding Adviser and HR Team if any allegations or suspected harm have been caused to a student by a team member
- ensure that the school/college complies with the work of the local safeguarding partnership
- ensure that all team members receive regular updated safeguarding training
- provide safeguarding updates to senior managers and school governors
- keep the Headteacher/Principal informed of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children and young people to have an Appropriate Adult (See PACE Code C 2019 and DfE Guidance Screening and Confiscation for further information)
- ensure that there is effective monitoring and oversight of all safeguarding concerns;
- promote the educational achievements of Looked After Children in line with the Children and Social Work Act 2017
- have details of the social worker for any looked after children and the name of the virtual school head in the relevant authority for any children/young people with a social worker or previously looked after child.
- work closely together with IT Services and providers to meet the needs of the school and requesting system specific training and support as and when required.
- Take lead responsibility for any safeguarding and child protection matters that are picked up through web filtering and monitoring systems in place, This includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checks to the filtering and monitoring systems
- Investigate any attempted access of inappropriate sites as soon as possible and take appropriate action; and refer appropriately any attempted access of websites related to extremism under Prevent duties and local arrangements for reporting

- The DSL will regularly analyse safeguarding, behaviour, attendance, bullying, child-on-child abuse, online safety, and restraint data to identify patterns, emerging risks and required interventions.
- have a thorough knowledge and understanding of *KCSiE 2026*

5.5 It is important that all team members understand the role of the DSL on their appointment within the school/college and as part of their induction. The DSL is responsible for ensuring that all team members understand their roles and responsibilities regarding safeguarding students and that a child-focused approach is taken. The DSL will assess safeguarding concerns within the context of the child or young person's environments in line with our contextual safeguarding approach.

5.6 The DSL must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns, including low level concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each student. Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, team members should discuss with the DSL (or deputy).

5.7 **Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare**. Schools and colleges have clear powers to share, hold and use information for safeguarding purposes. Please see 12.2 for further details.

5.8 When students leave the school or college, the DSL is responsible for ensuring that the necessary information is shared with the new school or college.

It is the DSL's responsibility to ensure that the student's child protection file is transferred to the new school or college as quickly as possible and as securely as possible. **This should be within 5 days for an in-year transfer or within the first 5 days of the start of a new term** to allow the new school to have support in place for when the student arrives.

Files must be transferred securely; the child protection file should be transferred separately from the main student file. Confirmation of receipt must be obtained. Schools must inform their Local Authority of all deletions from their admission register when a student of compulsory school age is taken off roll.

Where a child protection file is transferred, the DSL should include a clear, structured summary identifying current safeguarding concerns, relevant context, ongoing support needs, information relevant to risk to the child or others, and any actions already in place. Historic information should be presented with appropriate context so that safeguarding information supports, and does not

disadvantage, the student. Receiving schools and colleges should review safeguarding information promptly, seek clarification where information is unclear or incomplete, and ensure key team members are aware where required.

6.0 Safeguarding Training and Updates for all team members

6.1 As part of the training for team members and to ensure students are taught about safeguarding, governing bodies and proprietors should ensure that safeguarding training is integrated, aligned and considered as part of the whole-setting safeguarding approach, wider training and curriculum planning. They must regularly review the training programme to ensure that it includes all required knowledge and that team members understand how it is to be implemented.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all students.

Training and updates must cover KCSiE 2026 safeguarding themes, including universal support services, community-based Early Help and Family Help, artificial intelligence and AI-generated content, self-generated intimate images and deepfakes, misogyny and misandry, harmful sexual behaviour, serious violence, information sharing and data protection laws, information security and cyber security, children with medical conditions, SEND, young carers, children with a social worker, Operation Encompass notifications, and support for children who are questioning their gender.

6.2 All team members are expected to follow this policy and related statutory guidance.

All team members must read and follow:

- **Part one of *KCSiE 2026***

- all of the setting's and Group's policies, including:

  the School's:
  - Attendance Policy
  - Behaviour Policy
  - Anti-bullying policy
  - Low level concerns Policy
  - Child-on-child abuse Policy and Harmful Sexual Behaviour Guidance
  - Child Exploitation policy
  - Protecting Children & Young People from Radicalisation policy
  - Web Filtering and Monitoring policy
  - Mobile & Smart Technology Policy
  - Medication Policy
  - Description and guidance of the role of the DSL and the role of the Deputy DSL

the Group's:

- Group Safeguarding Statement
- Use of Restrictive Interventions and Reasonable Force Policy
- Suspension and Permanent Exclusion Policy
- Searching, Screening and Confiscation Policy
- Safer Recruitment policy
- Managing Allegations Against An Employee
- Data Protection policy
- Staying Safe Online
- AI Policy
- Gaming Devices Best Practice Guidance
- Whistle blowing and complaints policy
- Code of Conduct & Ethics Policy
- Photography of Injuries and Medical Conditions Policy
- Serious Incident Notification Policy
- Educational Visits & Activities Policy
- Alternative Provision Policy
- Work Experience Policy
- Group Supervision Policy

Team members should be familiar with and follow DfE Guidance:

- Working Together to Safeguard Children
- Working together to improve school attendance
- Children Missing in Education
- Promoting the Education of Looked After Children
- Teaching Online Safety in Schools
- Sharing nudes and semi-nudes: advice for education settings
- Searching, Screening and Confiscation
- Harmful Online Challenges and Online Hoaxes
- Preventing and tackling bullying
- Mental health and wellbeing support in schools and colleges
- Behaviour in schools: advice for headteachers and school staff
- SEND code of practice: 0-to-25 years

Information Sharing Duty: Statutory guidance for safeguarding organisations

CSA Centre provides resources to Help education settings identify and respond to concerns

6.3 The School/College will provide regular safeguarding updates to team members, either through face-to-face training, meetings or through regular written updates.

6.5 All team members must complete the mandatory training:

- Introduction to Safeguarding (e-learning) to be completed within the first week of employment
- Safeguarding Children Foundation within one month of employment

- The annual KCSiE e-learning course that provides updated statutory information and requirements that all education team members must be aware of

A line manager competency check must be completed annually (via competency check on *Shine*) in the years in between the formal safeguarding course. If there are any concerns regarding competency or knowledge the team member will be referred to complete a refresher or original safeguarding course.

DSLs (and their deputies) must refresh their advanced training at least every two years.

If a service has a specific need or issue in relation to Safeguarding, then they can request a closed virtual or closed face-to-face course to support with the need by contacting the Learning & Development Team training@ofgl.co.uk

6.6 All members of school leadership teams, including the Headteacher/Principal and DSL should also be familiar with Working Together to Safeguard Children

7.0 Roles and Responsibilities of Team Members

7.1 It is not just one person's role to safeguard students, a collective approach to safeguarding is required. All team members must understand their roles and responsibilities regarding keeping students reporting concerns.

7.2 During induction, team members will receive safeguarding training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Team members must be familiar and understand the role of the DSL, the local safeguarding partnership arrangements and the individual systems relating to safeguarding within the school or college.

7.3 Team members are responsible for:

- compliance with the Group's and setting's policies and statutory guidance and legislation, including *KCSiE 2026* and Working Together to Safeguard Children
- understanding the role of the DSL;
- attending training and meetings;
- helping to develop and deliver a curriculum which helps students to understand about abuse, neglect, exploitation, modern slavery, appropriate and safe relationships with adults and other children and young people, and staying safe both online and offline;
- understand the safeguarding response to students who are absent from education, persistently absent, repeatedly absent for part of the day, on a part-time timetable, not in receipt of full-time education, at risk of suspension or permanent exclusion, or missing from education
- ensuring they fully understand how to report concerns and if not, asking for further training and support
- listening to students and supporting students if they disclose safeguarding information
- ensuring that they are alert to signs of abuse and exploitation by other children, young people and adults and aware of indicators or possible signs of neglect

- ensuring that they closely monitor any possible signs of abuse and harm for those students who are unable to communicate verbally or who have complex health and care needs
- keeping sensitive information confidential and sharing it only with professionals for whom it is relevant
- helping to identify those students who may benefit from universal services and community-based Early Help, or the targeted early help level of Family Help
- helping to implement Child Protection Plans.

7.4 Team members are in a close position to students within schools and colleges and have regular contact with them, therefore are well placed to observe and identify behaviour that suggests a student is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, no matter how small they may seem, must be reported immediately to the DSL both verbally and in writing. **It is the team member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.**

7.5 All team members should be aware:

- that a student may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Team members must maintain professional curiosity and be alert to changes in a student's behaviour. Team members must speak to the DSL if they have any concerns about a student. It is also important that team members determine how best to build trusted relationships with students to facilitate communication.
- Students who are questioning their gender may experience additional vulnerability, including bullying, isolation, online harm, mental health concerns, or barriers to speaking openly with a trusted adult. Being gender-questioning is not in itself a safeguarding risk.

  Where a student or parent requests support with social transition, decisions must be documented, parents/ carers should normally be involved, the DSL should be consulted, and the school/college must consider the best interests of the student and other students, safeguarding duties, equality and human rights obligations, and any relevant clinical or professional advice. Team members must not make changes relating to social transition unless a school/college decision has been made through the agreed process. The school/college must not initiate social transition.

  Accurate records of a student's biological sex must be kept, and relevant team members must be informed in all cases.

  Students must not be allowed into toilets designated for the opposite biological sex. This includes where the setting is responding to a request to support any degree of social transition for students who are questioning their gender. Decisions about toilets, changing rooms, showers, boarding or residential accommodation, overnight arrangements, and single-sex sport

must follow statutory safeguarding, premises and equality requirements. Alternative arrangements should be considered where needed, provided they do not compromise the safety, comfort, privacy or dignity of any student.

7.6 All team members should be aware that safeguarding issues often overlap. Some common signs team members should be alert to that may indicate something concerning may be happening in a student's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn or seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body

Please see: NSPCC: Spotting the Signs of Child Abuse

These signs do not necessarily mean that a student is being abused, there could be other things happening in their life which are affecting their behaviour. Team members should discuss any concerns with the DSL.

For students with special educational needs or disabilities (SEND), and multiple complex co-occurring needs, it can be difficult for team members to distinguish between signs of abuse and behaviour that is part of the student's condition. Team members should be alert to ***changes*** in their behaviour and always consider all possible causes of this.

7.7 For students with medical conditions, allergies, long-term, complex or fluctuating health needs, team members must consider whether changes in attendance, behaviour, presentation, communication, medication, care routines or engagement may indicate safeguarding concerns. Safeguarding decisions should be informed by the student's individual healthcare plan, EHCP where applicable, and information from parents, carers and relevant professionals. A safeguarding referral must be considered where an incident or pattern indicates that a students may be at increased risk of neglect, abuse or exploitation because of their medical condition.

Please also see:

Children with disabilities - Safeguarding our most vulnerable

NSPCC - Safeguarding children with SEND

NSPCC - Safeguarding Deaf and disabled children and young people

7.8 Being Lesbian, gay, bisexual, transgender, queer, questioning and/or ace (LGBTQ+) is not in itself an inherent risk factor for harm. However, students who are LGBTQ+, or are perceived to be LGBTQ+, can be targeted by other children and young people. Risks can be compounded where students who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that team members endeavour to reduce the additional barriers faced and

provide a safe space for them to speak out or share their concerns with team members.

Please note: We have chosen to use the term 'LGBTQ+', because this abbreviation appears to be most inclusive and commonly used by the community.

7.9 Looked after children and previously looked after children can potentially remain vulnerable and all team members should have the skills, knowledge and understanding to help keep them safe. It is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

7.10 If the school/ college becomes aware that a student under the age of 18 is subject to a private fostering arrangement, the local authority must be informed so they can assess and support them to ensure it is a safe place for the child or young person. Private foster carers are people who are not a close relative to a child/young person but plan to look after them for 28 days or more. Team members should inform the DSL immediately if they become aware of a private fostering arrangement.

7.11 Team members should be aware that children and young people can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships as teenagers. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

The Headteacher/Principal and DSL should be familiar with Operation Encompass which enables schools, colleges and police to work together to provide emotional and practical help to students, where police have been called to an incident of domestic abuse in the household.

Operation Encompass notifications must be handled confidentially, securely and in line with data protection laws. The DSL or nominated Key Adult should ensure notifications are reviewed promptly, recorded appropriately, and used to provide timely support. Operation Encompass does not replace statutory safeguarding procedures or referrals to children's social care where these are required.

7.12 The school/college must ensure that students know:

- how to report any concerns and feel confident that they will be listened to and supported.
- They can also report any concerns by emailing tellus@ofgl.co.uk, which is monitored by the Quality Team.
- Are aware they can contact the NSPCC dedicated helpline on 0800 136 663 or by emailing help@NSPCC.org.uk
- Are aware of how to contact Childline (0800 1111)

7.13 Team members are not permitted to use personal mobile phone devices, cameras or digital recording devices at any time during operational hours within the setting in line with the ***Mobile & Smart Technology Policy***. Team members should be supported to safely store away their personal devices during these times in a lockable personal storage area, with personal keys provided to each team member.

Team members are advised if they wish to take their personal devices out of storage, they are only permitted to do so during their designated break times, with the restriction of only doing so in the designated team members room area. Company devices will be provided as and where appropriate to support team members to capture images of any Learning & Development within the school.

8.0 Safer Recruitment

8.1 The Group's ***Safer Recruitment Policy*** sets the processes which must be followed for the recruitment of team members, which includes the requirement for enhanced DBS and other checks. The Resourcing Team will add a statement to all vacancy adverts to inform candidates that online searches are done as part of due diligence for shortlisted candidates.

8.2 It is the responsibility of the Headteacher/ Principal to ensure that the **Single Central Record** (SCR) of pre-employment checks is compliant with legislation and statutory guidance and kept up to date and is stored confidentially.

The SCR must be accurate, up to date and checked regularly, including checks relating to employees, governors, proprietors, volunteers, agency and supply staff, trainee teachers, contractors, self-employed workers, alternative provision, work experience, homestay arrangements and any adults supervising children where relevant.
From 1 September 2026, the supervision exemption for volunteers is removed: any regular or overnight volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in a 30-day period, or overnight, is in regulated activity and requires an enhanced DBS check with children's barred list information in line with the ***Safer Recruitment Policy***.

8.3 It is the responsibility of the hiring manager at the school/college to ensure that copies of the documents used to verify the successful candidate's identity, right to work, required qualifications and references should be kept on their personnel file. The Headteacher/Principal and Safeguarding Governor should conduct regular audits to assure themselves that the correct documents are in place and stored safely.

Schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. If they do retain them, there must be a valid reason for doing so and they should not be kept for longer than six months as they are covered by UK GDPR/DPA 2018 Article 10.

9.0 Universal and Community-based Early Help and Targeted Early Help

9.1 Team members should all be alert to students and families who may benefit from universal services, community-based early help, targeted early help

delivered through Family Help, or other statutory services under the Children Act 1989. A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development without services, whose health or development is likely to be significantly impaired without services, or who is disabled. Local authority thresholds and referral procedures must be followed.

Team members must be aware and alert to the possibility of early help being needed for those students who have particular vulnerabilities, such as those who:

- are disabled or have certain health conditions and specific additional needs
- have special educational needs (whether or not they have an EHCP)
- are suffering from mental ill health
- are young carers
- are pregnant or is a parent themselves
- exhibit early signs of abusive, violent and/or harmful behaviours
- are frequently missing/goes missing from education, home or care
- are persistently absent from school, including persistent absences for part of the day, or not in receipt of full-time education
- have been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are at risk of modern slavery, trafficking, sexual or criminal exploitation, of being radicalised into terrorism or exploited
- are in a family circumstance presenting challenges, such as drug and alcohol misuse, adult mental health issues, domestic abuse;
- have a parent/carer/family member in custody or is affected by offending by a family member
- are misusing drugs or alcohol themselves
- have returned home to their family from care
- are at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage;
- are privately fostered

More information on community-based Early Help is set out in Part one of KCSiE and in Working Together to Safeguard Children.

9.2 It is important that team members take swift and effective action to safeguard students as soon as there is any concern. Support may be managed internally, including through pastoral support, where appropriate, but only where doing so does not place the student at additional risk. The DSL must consider whether parents/carers should be informed to support the child's wellbeing, unless doing so would increase risk. Team members must understand local processes for universal services, community-based early Help and targeted early help and Family Help, statutory thresholds, and their role in contributing to multi-agency support.

9.3 Social care assessments should also consider where the child/young person is being harmed in contexts outside the home. It is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm

9.4 When a student has been referred for Early Help, it is the responsibility of the DSL to set up an inter-agency assessment as appropriate. Team members may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review, and consideration must be given to a referral to children's social care for assessment for statutory services if the student's situation does not appear to be improving or is getting worse.

9.5 Where Family Help arrangements are in place locally, the DSL should understand how the school/college contributes to assessment, planning, review and information sharing. School-led pastoral support must not delay referral to children's social care where a child or young person is suffering, or is likely to suffer, significant harm.

10.0 Reporting concerns

All safeguarding concerns must be reported to the DSL or deputy immediately and recorded on the school/college electronic recording system as soon as practicable **on the same working day**. Where a child or young person is in immediate danger, is suffering or is likely to suffer significant harm, a referral must be made to children's social care and, where appropriate, the police without delay. Any separate organisational notification requirements must not delay action to safeguard the child.

10.1 What to do if a student discloses

Well promoted, easily understood and easily accessible systems should be in place for students to confidently report abuse, neglect, exploitation, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a student discloses information to a team member, the team member will:

- listen to the student and reassure them they are being taken seriously and that they will be supported and kept safe
- never give them the impression they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment. They must never be made to feel ashamed for making a report
- not dismiss what the student tells them. All concerns must be acted upon rigorously
- not promise to keep it a secret. The team member must explain that they have a duty to share information to keep them safe and protect them
- write down what the student tells them. This must be accurate and in the student's words
- immediately report the concerns to the DSL or deputy. If neither is available, the member of team member must report the information to the Headteacher/Principal or Regional Director/Operations Director.

10.2 Team members must be alert to not just potential familial abuse and allegations, but also to students making allegations against team members or other children. In these situations, the Group's Managing Allegation Procedures must be followed. (See Section 24 for further details).

10.3 All concerns, however small they may seem, **must** immediately be reported to the DSL. This must be done verbally and then followed up **on the same day** and documented on the school's electronic recording system. The team member has a responsibility to ensure that action has been taken about the concern on the **following day,** and that the concern is documented on the system. If action is not taken in a timely way as the team member sees fit, they have a duty to escalate their concerns to the Headteacher/Principal or Regional Director/ Operations Director.

10.4 Team members must prioritise the student's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DSL or deputy, they must not share it with anyone else.

10.5 On receipt of the information, the DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director/Operations Director, and where relevant, the Local Authority Designated Officer or local equivalent.

11.0 Managing Referrals to Disclosure and Barring Service (DBS) and professional bodies

11.1 As a result of an allegation or investigation a referral may be required. This can include referrals to DBS, Disclosure Scotland, Social Work England, Scottish Social Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), Teacher Regulation Authority/ General Teaching Council for Scotland (GTCS), and the Health & Care Professions Council (HCPC) for clinicians.

11.2 **The Headteacher/Principal is responsible for making the referral at the appropriate time.** The timing of the referral can vary by nation and by the severity of the concern. The Headteacher/Principal must be familiar with the national requirements and make the referral at the appropriate time.

11.3 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made in line with ***Allegation Management Policy*** and ***Disciplinary Policy***. **It is an offence in all UK nations not to make a referral to the appropriate disclosure body**

11.4 If a referral is made, at the point of completion the Headteacher/Principal must notify safeguarding@ofgl.co.uk and the Human Resources Advisor peopleadvice@ofgl.co.uk of the referral and any other possible referrals to any relevant professional body in the UK.

11.5 Where a teacher is dismissed or their services are no longer used because of serious misconduct, or might have been dismissed, or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

12.0 Partnership working and sharing information

12.1 Partnership working and the sharing of information is key in keeping students safe. Everyone who has a role in supporting children and young people has a responsibility to share relevant information with appropriate professionals in a timely manner. **There is no minimum threshold of harm before information may be shared where doing so may assist in safeguarding or promoting a child's welfare.**

12.2 Information Sharing and Data Protection

All schools and colleges must ensure that they comply with the Group's Data Protection Policy, Information Sharing Duty, UK GDPR, Data Protection Act 2018 , Data (Use and Access) Act 2025. It applies to students' personal information, as well as that of team members and parents/carers.
All team members must complete the GDPR training and have a responsibility to ensure that they comply with the GDPR requirements.

We recognise our responsibilities under the statutory Information Sharing Duty. Relevant information must be shared with appropriate safeguarding partners where it may assist them to safeguard or promote the welfare of a child. The duty supports the sharing of information for prevention, early help, assessment, safeguarding activity and welfare support, and is not limited to situations where significant harm is suspected.

Data protection laws do not prevent the sharing of information where this is necessary to safeguard or promote the welfare of a child. Safeguarding concerns must always be passed on. It is not necessary to seek consent to share information for safeguarding purposes where there is a lawful basis to process and share the information. Where information is shared in accordance with the statutory Information Sharing Duty, consent is not required. Team members must not delay sharing relevant safeguarding information in order to seek consent where doing so may impede safeguarding action or welfare support.

Team members must share information at the right time with the right people when it is necessary to safeguard or promote the welfare of a child. They should consider whether the information is relevant, necessary, proportionate, clearly presented and appropriately contextualised. They should be professionally curious, record the rationale for decisions, and seek advice from the DSL, Data Protection Officer or Legal Team where needed, but uncertainty about data protection must not delay necessary safeguarding action.

Information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a child or young person in a timely manner. Relevant information should normally be shared in accordance with the Information Sharing Duty. Information should only be withheld where sharing it would be likely to cause greater harm to the child/young person than not sharing it. Such circumstances are expected to be rare. Where there is any doubt, advice should be sought from the DSL and, where appropriate, the Group's Legal Team.

Appropriate records of information-sharing decisions will be maintatined, including what information was shared, the purpose for sharing, the recipient and the rationale for the decision where appropriate.

12.3 Schools/ colleges must ensure that they inform students, parents and carers of how their personal information will be stored and used. The Data Protection in schools guidance is recommended for team members.

12.4 Schools and colleges must ensure that they hold emergency contact details of the parents/carers of students. This should include more than one emergency contact number for each student where reasonably possible, to support safeguarding and welfare where a child is absent from education or cannot be contacted.

12.5 Data breaches must be reported immediately to Group's Data Protection Officer via Information Exchange as set out in the Group's ***Data Protection Policy***.

Please also see:

The Group's Data Protection Policy.

Information sharing advice for safeguarding practitioners - GOV.UK

Sharing information to safeguard children and young people in the education sector in the UK Information Commissioner's Office (ICO)

Improving multi-agency information sharing (publishing.service.gov.uk)

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

13.1 The school/college recognises that children can abuse other children, and that such behaviour can occur, inside and outside school or college, online and offline, and in the wider community.

We maintain a zero-tolerance approach to all forms of abuse, harassment, violence and harmful behaviour. All team members must understand the setting's policy and procedures for preventing, identifying, reporting, recording and responding to child-on-child abuse, including harassment, violence, harmful sexual behaviour, sexual harassment and sexual violence. Team members must familiarise themselves with the ***Child-on-Child Abuse Policy*** and ***Harmful Sexual Behaviour Guidance*.**

Local Safeguarding procedures must be followed, and any incidents of sexual violence will be reported to the police.

13.2 *KCSiE 2026* makes clear that downplaying inappropriate behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse and stops children coming forward to report it.

Team members must ensure they create an environment where unacceptable or unsafe behaviour is not tolerated. Inappropriate behaviour and language must be challenged, including any gender bias or derogatory language used.

13.3 Team members must maintain an attitude of '**it could happen here'** and be vigilant to any signs. The absence of reported concerns does not mean that child-on-child abuse is not occurring. Students may be reluctant or unable to report abuse because of embarrassment, fear, trauma, communication difficulties, coercion, additional vulnerabilities or not recognising that what they are experiencing is abuse.

It is essential that all victims are reassured that they are being taken seriously, and that they will be supported and kept safe. Abuse that occurs online or outside of the setting should not be downplayed and should be treated equally seriously.

Team members must never dismiss any concern brought to them by a student. Any concern, however small, must be reported immediately to the DSL or Deputy DSL and recorded **on the setting's electronic recording system before the end of the school day.**

13.4 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 and young people (also known as teenage relationship abuse) including physical, sexual, emotional abuse, stalking and financial exploitation
- physical assault or harm, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment e.g. sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- misogyny, including online misogynistic content, language or behaviours that normalise harassment, coercion, harmful sexual behaviour or violence;
- sexual violence, such as rape, assault by penetration (for example, rape or penetration with an object) and sexual assault. 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 constitute sexual assault.
- consensual and non-consensual sharing of self-generated intimate images and/or videos, including images or videos created, altered or shared using artificial intelligence such as 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
- 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)
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm

Any incidents involving the making or sharing of nudes or semi-nudes must receive a safeguarding response, whether they appear consensual or non-consensual. **Team members must not view or forward illegal images of a**

child/young person unless this is unavoidable as part of an immediate safeguarding response and it must be carried out in accordance with UKCIS guidance and the school's procedures.

13.5 All team members should be aware that child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child or children alleged to have caused harm. It is preventable, and timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. A child-centred and contextual safeguarding approach will be taken in all cases.

It is also important for team members to understand intra familial harms and any necessary support for siblings following incidents. This applies whether siblings attend the same or a different school.

The DSL will consider age, development, coercion, exploitation, vulnerability, online harm, evidence preservation, police involvement and specialist support.

The DSL or deputy must ensure that support, supervision, risk management and, where appropriate, consequences are considered for all students involved, including witnesses and any wider peer group affected by the incident. Risk assessments must be implemented where necessary.

13.6 Preventative education must be embedded through a whole school/ college approach and will be age and developmentally appropriate. It should cover healthy and respectful relationships, boundaries, consent, equality, stereotyping, prejudice, misogyny and misandry, online harms, deepfakes, pornography, coercive and controlling behaviour, sexual harassment, sexual violence, how to report concerns and how to access support.

Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

Please also refer to Part Five of KCSiE 2026: Child-on-Child Sexual Violence and Harassment.

13.7 When a report of harmful sexual behaviour, sexual harassment or sexual violence is made, the DSL or deputy will lead the response, which must be calm, supportive and child-centred; the child must be reassured that they are being taken seriously, will be supported and kept safe. They must not be made to feel ashamed or responsible for making a report.

13.8 Following any report of sexual violence, the DSL or deputy must complete and record an immediate risk and needs assessment. For reports of sexual harassment, the DSL or deputy must consider whether a risk and needs assessment is required. Assessments should consider the safety and support needs of the student harmed, any alleged perpetrator, other children and young people, witnesses, team members, the wider school community, transport arrangements, online risks, and the time and location of the incident.

13.9 Where a report involves rape, assault by penetration or sexual assault, the starting point is that it should be referred to the police, normally alongside a referral to local authority children's social care.

Team members should explain in an appropriate way to the student that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.

The school/college must not wait for the outcome of a police or social care investigation before taking immediate action to protect the child harmed, any alleged perpetrator and other children.

13.10 Where the student who has experienced sexual violence shares classes, transport or other spaces with the alleged perpetrator, the school/college must consider immediate separation and protective arrangements. For reports of rape or assault by penetration, the alleged perpetrator should be removed from any shared classes while the facts are established and external agencies are consulted. Any arrangements must be proportionate, recorded, regularly reviewed and must not be presented as a judgement of guilt.

13.11 All concerns, reports, decisions, rationale, actions, outcomes and reviews relating to child-on-child abuse must be recorded in writing. Records should be reviewed to identify patterns of concerning, problematic or inappropriate behaviour, unsafe locations, online trends, peer group dynamics or wider cultural issues. Where patterns are identified, leaders must consider whether policy, supervision, curriculum, training, environmental or safeguarding partner action is required.

13.12 When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour.

Consideration must be given to any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

13.13 Where the DSL believes that there has been significant harm caused to the student, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.
If the local authority does not believe it meets their threshold for further action and the DSL is not in agreement, this must be challenged with the local authority.

13.14 **After the outcome/conclusion of the incident**:

- a contextual safeguarding approach must be taken
- all necessary action to learn from the incident and prevent future incidents occurring must be taken, such as through targeted education around specific types of child-on-child abuse
- support for the victim must be offered and provided. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim
- schools/colleges must ensure that they **do not** adopt a victim blaming approach

- the DSL must complete an investigation into the incident. The investigation must consider the incident and whether it is an isolated incident or not, and the personal circumstances of the student who is alleged to have displayed harmful behaviour
- if necessary, appropriate referrals must be made to support services for the student who has displayed harmful behaviours
- a risk assessment must be completed and implemented for the student who has displayed harmful behaviours in order to safeguard them and other students.

14.0 Bullying (Please also see the **Anti-bullying *Policy*** *and* ***Behaviour Policy*****)**

14.1 Bullying, including cyberbullying, prejudice-based bullying and discriminatory bullying can result in significant harm and must be treated as a safeguarding matter. Bullying can be overt and plain for all to see. It can also be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'.

Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. It is sometimes linked to protected characteristics, SEND, medical conditions, mental health, sex, sexual orientation, gender reassignment, race, religion or belief, or perceived difference.

14.2 The school/college has a zero-tolerance approach to bullying, abuse, harassment, violence, racism, faith-based prejudice, homophobia, biphobia, transphobia, misogyny and misandry.

Team members must be alert to bullying that occurs inside or outside school, online, on transport, during transitions, around the start and end of the school day and through group chats or social media.

All reports must be taken seriously, recorded, investigated and responded to in a way that protects the student harmed, addresses the behaviour and considers whether wider action is needed.

14.3 Team members must help students to understand what bullying is and how to report it. Team members must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.

14.4 Students must have well-promoted, easily understood and accessible routes to report bullying and must be confident that concerns will be listened to and acted on. Leaders should review bullying records to identify patterns, unsafe locations, online trends, vulnerable groups, repeat behaviours and any need for curriculum, supervision, training, environmental or multi-agency action.

Schools/colleges have a responsibility to ensure that those students who bully, are supported and helped to understand the impact of their actions.

14.5 Please see the following government guidance on preventing and tackling bullying in schools:

Preventing and tackling bullying
Mental health and behaviour in schools
Behaviour in schools: advice for headteachers and school staff

15.0 Preventative Strategies

15.1 It is important that students are taught about how to keep themselves and others safe, including online. Preventative education is embedded through a whole setting approach and safeguarding culture to prepare students for life in modern Britain and create a culture of zero tolerance for sexism, racism, misogyny, misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. It is effectively tailored to the specific needs and vulnerabilities of individual students.

For students who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care and education. The support required must be tailored to the individual student's needs and be included in their Care Plan.

15.2 The school/college will take all appropriate action to ensure that students learn about appropriate relationships, keeping safe, online safety as well as sex and healthy relationships. Relationship, sex education (RSE) and health education lessons will focus on important age-appropriate issues in line with RSE and health education statutory guidance. Team members must ensure that students have the opportunity to learn about safe relationships as well as who they can talk to if they have any concerns. Support and training materials for can be found here: Teaching about relationships sex and health (Please also see the ***RSHE Policy***)

LGBTQ+ inclusion is part of the statutory RSHE curriculum for secondary schools, and there is a range of support available to help education settings counter homophobic, biphobic and transphobic bullying and abuse.

15.3 Students will be supported by team members to understand what abuse, neglect, exploitation and modern slavery are. Students must be listened to and enabled to report any abuse, neglect, exploitation or modern slavery at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse and be able to access relevant websites in private and helplines, such as Childline to seek advice and help.

15.4 The school/ college recognises that some students are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all team members have a responsibility to be their 'eyes and ears' and report any concerns to the DSL.

15.6 Preventative education is reinforced through leadership, behaviour expectations, pastoral support, staff training, assemblies, tutor time, RSHE and wider curriculum opportunities. Leaders will review safeguarding, attendance,

behaviour, bullying and online safety information to identify themes and adapt teaching, supervision and support accordingly.

16.0 Online Safety and Security

Please also see the ***Web Filtering & Monitoring Policy***, ***Staying Safe Online Policy*** and ***Mobile & Smart Technology Policy***.

16.1 Online safety is central to our safeguarding culture with a whole setting approach to online safety to help equip students with knowledge and understanding to stay safe online. The school/college helps and supports its students to recognise and avoid online safety risks and to help build their digital resilience in an age and developmentally appropriate way, and how to report concerns. This is integrated into everyday learning and covered in detail as part of the RSE and health education curriculum.

16.2 The breadth of issues within online safety is considerable and ever evolving but can be categorised into four areas of risk: Content, contact, conduct and commerce. These include exposure to illegal, inappropriate or harmful content; harmful online interaction with other users or generative AI applications; online behaviour that causes or increases harm, including making, sending or receiving explicit images and AI-generated images; and risks such as online gambling, inappropriate advertising, misinformation, phishing and financial scams. The ***Staying Safe Online Policy*** provides further information.

There are a range of resources to provide support for online safety in schools at: childnet.com

16.3 The school/college will work with parents and carers to help keep students safe online. Parents and carers will be informed about what their children are being asked to do online, including the sites they will be asked to access and if their child will be interacting with others online.

16.4 The school/college has appropriate filtering and monitoring systems in place on school devices and networks that limits the exposure to such risk over the setting's Wi-Fi network. The school/college works with the Group's IT Section to ensure that the filtering and monitoring systems are appropriate, and are informed in part, by the risk assessment required by the Prevent Duty and the age, needs and vulnerabilities of students. The ***Web Filtering & Monitoring Policy*** includes information about the systems used to filter and monitor online use.

The effectiveness of filtering and monitoring is reviewed at least once every academic year by the senior leader responsible for filtering and monitoring, with support from the DSL and IT support. Reviews include checks that filtering is working on all internet-connected devices in relevant locations, and a record of checks and actions must be kept.

This process is supported by an annual risk assessment that considers and reflects the risks students face. A free online safety self-review tool for schools can be found at https://360safe.org.uk/ or LGfL online safety audit

SWGfl has created a testing tool that can be used to check the filtering system

is blocking access to illegal child sexual abuse material, unlawful terrorist content and adult content.

16.5 **If a team member has reason to believe that a student is experiencing harm or is at risk of harm,** including harm linked to online activity, artificial intelligence, deepfakes, self-generated intimate images, harmful misinformation, online misogyny, harmful online challenges, grooming, coercion or exploitation, **the reporting process set out in this policy in Section 10 must be followed immediately.**

16.6 If a team member becomes aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the student.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the student's family, and placing authority where relevant, as appropriate.
- Review the supervision and support arrangements for the student accessing the internet.
- Check the privacy and security settings on the student's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk; the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the student.

16.7 UKCIS provide a range of resources to support schools and colleges to further develop a whole setting approach towards online safety, including:

- Using external expertise to support online safety education
- Appropriate Filtering and Monitoring
- Sharing nudes and semi-nudes: advice for education settings
- Sextortion

Further helpful resources can be found at:

- Harmful Online Challenges and Online Hoaxes (DfE Advice)
- National Crime Agency's CEOP education programme: ThinkuKnow and Cyber Choices
- LGFL Undressed provides advice about how to teach children and young people about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

17.0 Children and young people who are absent from education

The DfE's statutory guidance Working together to improve school attendance sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

17.1 All team members must be aware of the risks associated with children and young people being absent from school or college. Prolonged or frequent absences can be a warning sign for a range of safeguarding issues, including neglect and exploitation - particularly county lines. It is important that the

school's/college's response to persistently absent students and children missing education must support the identification of such abuse, and in the case of absent students of compulsory school age, helps prevent the risk of them becoming a child missing education in the future.

It is important to be aware that children and young people already known to local authority social care, such as a looked after child, previously looked after child, a child in need or with a child protection plan, may be at increased risk from known safeguarding risks if they are absent from education may increase known safeguarding risks.

Where there are serious concerns that a missing child or young person may be at risk of serious harm, this must be escalated in line with the ***Serious Incident Notification Policy*** within **24 hours.**

17.2 Early identification and timely intervention are key to protecting vulnerable children and young people. Schools and colleges must follow the procedures set out in their ***Attendance Policy*** to monitor and manage attendance. The attendance of students of compulsory school age will be managed in line with legal requirements and statutory guidance as detailed in the ***Attendance Policy***.

17.3 Attendance must be monitored through the setting's Senior Leadership Team meetings and governance.

17.4 The DSL must contact the main emergency contact as detailed on the student's file should there be concerns regarding the student absent from education.

Team members must report all unauthorised absences to the DSL, who must make contact with the student's parent/carer immediately to establish the student's whereabouts. The DSL must inform the placing authority (where relevant) of students who are frequently absent.

17.5 The DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a student who is absent from education. The DSL **must** refer any safeguarding concerns regarding the absence of the student to the local authority.

Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.

17.6 Students who are repeatedly absent from education are at increased risk of harm. Attempts must be made to talk to them about why they are absent from education. Records must be kept of those discussions.

Any safeguarding information which the student discloses must be shared **immediately** with the local authority. If the student discloses immediate safeguarding concerns, the DSL must share this information with the police.

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

18.1 Exploitation is a form of child abuse and can include sexual and/ or criminal

exploitation. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

18.2 CSE and CCE can affect boys and girls and can include children and young people who have been moved (referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery; further information is available in the Modern Slavery Statutory Guidance.

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

18.3 CSE and CCE can affect any child or young person who has been coerced into engaging in sexual or illegal activities. This includes 16 and 17-year-olds who can legally consent to have sex. Most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

18.4 Schools must write and implement a local exploitation procedure which team members must be familiar with. All team members **must read the *Child Exploitation Policy*** and refer to KCSiE 2026

18.5 All team members **must** complete the ***Exploitation - An Introduction*** course on Shine and know the definitions, signs and indicators of CSE, CCE and County Lines. The DSL will provide ongoing training and learning to team members around exploitation.

18.6 Team members **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to a child's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director/Operations Director.

18.7 It is the responsibility of all team members to help students know about grooming and exploitation. Schools and colleges must ensure that students know who to talk to if they have any concerns for themselves or others.

18.8 The school/college will consider referrals to the local Youth Justice Service, violence reduction services and contextual safeguarding partnerships where a student is displaying risk factors associated with exploitation, offending, serious violence or anti-social behaviour.

Please also see:

Multi-agency principles - child exploitation and extra-familial harm

The Children's Society - Preventing Child Sexual Exploitation

The NWG Network provides Information to help educate and prevent child exploitation and abuse across the UK. The Group has membership of the network for all team members, for access please send a request to safeguarding@ofgl.uk

19.0 Serious violence

19.1 All team members should be aware of indicators, which may signal students are at risk from, or are involved with serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child or young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

19.2 All team members should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

We recognise the importance of early identification and intervention. Students at risk of involvement in serious violence will, wherever appropriate, be supported through trusted adult relationships, social and emotional support, mentoring, therapeutic interventions and multi-agency working.

19.3 Team members must report any concern that a student is carrying, has access to, has used, or has expressed an intention to use a weapon, or is involved in escalating peer conflict, to the DSL immediately. The DSL must assess the risk, consider whether immediate police or children's social care involvement is required, and take appropriate steps to de-escalate conflict, protect students, and provide targeted support.

Further guidance for professionals can be found here:

Advice to schools and colleges on gangs and youth violence

Criminal exploitation of children and vulnerable adults: county lines

County Lines Toolkit for Professionals

20.0 'Honour'-based abuse including FGM and Forced Marriage

20.1 Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their

actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

20.2 HBA can affect people of all ages but often begins early in the family home. Girls and women are particularly at risk; however, boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.

20.3 HBA can take many forms, it can include: forced marriage; female genital mutilation; breast ironing; virginity testing and/or physical, sexual and economic abuse and coercive control. Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

20.4 **If team members have a concern regarding a child or young person who might be at risk of HBA or who has suffered from HBA, they must speak to the DSL (or deputy).** As appropriate, the DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

20.5 All team members must report any concern that a student has been subjected to, or is at risk of, Female Genital Mutilation (FGM) to the DSL. **Teachers have a specific legal duty; if in the course of their work in the profession, they discover that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.**
Section 5B of the Female Genital Mutilation Act 2003)

20.6 Team members must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': Female Genital Mutilation: the facts

20.7 Since February 2023, the legal minimum age to enter into a marriage in England and Wales is 18. In these nations, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email fmu@fcdo.gov.uk. A Forced marriage resource pack has been designed to highlight examples of best practice and to help ensure that effective support is available to victims of forced marriage.

Multi-agency statutory guidance for dealing with **forced marriage**, can found at: The right to choose: government guidance on forced marriage

20.8 The DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse, CSE and Trafficking or Radicalisation are shared **immediately** with the Regional Director/Operations Director and Chair of Governors, and that team members have documented them appropriately.

21.0 Preventing Radicalisation and the Prevent Duty

Team members must be familiar with the **Protecting Children & and Young People from Radicalisation & Extremism (Prevent Duty) Policy**

21.1 We fully recognise our responsibility to have arrangements in place to safeguard and protect students from radicalisation. Section 26 of the Counter-Terrorism and Security Act 2015 places a statutory responsibility on schools and colleges to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent Duty

21.2 All team members must be aware of the signs and indicators of radicalisation. Team members must be proactive in reporting any concerns, regardless of how small they may be, to the DSL who must assist team members to report all concerns regarding radicalisation to the Police as well as the Regional Director/Operations Director. Team members must document their concerns appropriately.

21.3 To safeguard students who are vulnerable to radicalisation, DSLs will need to take a risk-based approach and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. Further information can be found at: Understanding & identifying radicalisation risk in education settings

21.4 DfE has produced a self-assessment tool for schools and FE providers in England to review their responsibilities under the Prevent Duty, The tool helps schools and colleges to understand how well embedded their existing policies and practices are, and to encourage a cycle of continuous review and improvement. It contains requirements and recommends good practice activities to meet those requirements.

21.5 All team members must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Students requiring support with their Mental Health

22.1 We recognise that schools and colleges have an important role in supporting the students' physical and mental health and wellbeing.

22.2 **All Team members should be aware that, in some cases, mental health difficulties can develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide.** They can also be an indicator of a child or young person suffering or being at risk of abuse, neglect, exploitation or modern slavery, bullying, discrimination, trauma or other safeguarding concerns.

Team members should not assume that concerning behaviours are solely attributable to a mental health difficulty and should always consider whether additional vulnerabilities or safeguarding concerns may be present. Mental health difficulties may present differently in students with SEND, who may experience additional barriers to communicating distress or seeking support.

22.3 Whilst only appropriately qualified professionals can make a diagnosis of a mental health difficulty, school and college team members are well placed to observe and identify behaviour that suggests a child or young person may be experiencing a mental health difficulty. Potential warning signs which team members are well placed to recognise can include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves

Team members must record their observations on the school/college's electronic recording system and report any concerns promptly to the DSL. Any concerns relating to self-harm, suicidal ideation, suicide risk or a significant deterioration in a child or young person's mental health should be reported without delay. **If team members feel that a child is in danger, they must call 999 or arrange for them to be taken to A&E immediately** by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, team members can get help from NHS 111 online or call 111 and select the mental health option.

All schools and colleges have systems in place for referring to appropriate agencies for additional support. This will ordinarily be with the consent of the student and their family, where appropriate. Schools and colleges will work collaboratively with families, external agencies and, where available, appropriately qualified Clinical Team members to support assessment, intervention planning and access to appropriate services. Where concerns are identified at an early stage, consideration should be given to the provision of Early Help. All details of concerns and any referrals or other support arranged for the student should be documented on the setting's electronic recording system.

22.4 The Mental Health and Behaviour in Schools guidance (2018) provides guidance advice on how to create a whole school culture in promoting positive mental health outcomes for students. This guidance is written for schools, but the interventions and support included may also be helpful for colleges and other post-16 provision.

Every Mind Matters provides simple, practical advice and resources that may support teaching, wellbeing conversations and signposting for students, parents, carers and team members.

23.0 Restrictive Interventions and Use of Reasonable Force

All team members must read and follow the *Use of Restrictive Interventions and Reasonable Force Policy* that has been developed in line with DfE's Restrictive Interventions, including use of reasonable force, in schools

23.1 Whilst we work to create an atmosphere of nurturing, unconditional positive regard and warmth in the setting, we recognise that on occasion it may be necessary to use physical intervention to keep a student safe. Physical intervention must be a last resort and must always be proportionate. Once the student is safe and calm, it is essential that there is a debrief with them. It should be an open discussion with the team member encouraging the student to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the setting's electronic recording system.

23.2 If a student makes an allegation after a physical intervention, it is important that the team member writes down as much information as possible. Team members must complete body maps immediately after the event and make an appropriate electronic record. Team members must also verbally inform the DSL (or deputy) and record it onto the setting's electronic recording system. **Medical attention must always be sought for the student.** Team members must inform parents/carers.

Allegations of harm relating to physical interventions must be reported to the Regional Director/Operations Director, the Director of Safeguarding/ Safeguarding Adviser (safeguarding@ofgl.co.uk) and the Local Authority Designated Officer or local equivalent.

24.0 Allegations against team members

Please also see the Managing Allegations Against an Employee Policy

24.1 An allegation is any concern, complaint or disclosure that indicates a team member has:

- Behaved in a way that has harmed a student or may have harmed a child or young person
- Possibly committed a criminal offence against or in relation to a student
- Behaved towards a students or students in a way that indicates he or she may pose a risk of harm to students; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people.

24.2 All allegations must be treated seriously. Team members must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that team members maintain a level of professional curiosity. Team members have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Team members must report any concerns to the Headteacher or Regional Director/Operations Director.

24.3 If a team member has a safeguarding concern about another team member, or if an allegation that a team member (including supply staff, trainee teachers, volunteers or contractors) has harmed a child, may have harmed a child, committed an offence against or related to a child, behaved in a way that indicates they may pose a risk of harm to children, or behaved in a way that indicates they may not be suitable to work with children, the concern must be reported to the Headteacher/Principal immediately.

The Headteacher/Principal will consider whether a referral to the Local Authority Designated Officer (or equivalent) is required, if it is required the referral must be made within one working day. Where concerns do not meet the harm threshold, they must be managed in accordance with the ***Low-Level Concerns Policy***.

Where there is a concern/allegation about the headteacher or principal, this should be referred to the Regional Director/Operations Director or the Managing Director.

All safeguarding concerns and allegations will be taken seriously regardless of whether a student has made previous allegations.

If a team member feels unable to raise a concern through the routes outlined above should report the matter directly to the LADO (or equivalent) and/or utilise the Group's Whistleblowing Policy and Procedure. Team members may also seek advice or raise concerns through the Group's independent Safecall reporting service.

24.4 Part four of KCSiE 2026 outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff or any team member employed by a third party working in the setting. Whilst the individual may not be employed by the Group, **schools and colleges must ensure that allegations are managed properly.**

KCSiE 2026 states: *'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'*

24.5 If the allegation is regarding the Headteacher/Principal then the Regional Director/Operations Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer local equivalent.

24.6 All allegations made against team members must be reported to:

- the Regional Director/ Operations Director
- Human Resources (peopleadvice@ofgl.co.uk)
- Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk)

The Group recognises that managing allegations can be challenging and will support with the process. Please refer to the ***Managing Allegations Against an Employee Policy*** for further details.

24.7 It is the responsibility of the DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

25.0 Low-level concerns

Team members must read and follow the *Low-Level Concerns Policy*

25.1 Team members must understand what low-level concerns are and be aware of the process for addressing such concerns.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that **an adult working in or on behalf of the school or college** may have acted in a way that is inconsistent with the Group's Code of Conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or local equivalent. (KCSiE 2026)

Examples may include but are not limited to:

- being over friendly with students; erosion of boundaries
- taking photographs of students on their mobile phone;
- having favourites; engaging with a student on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

25.2 **The Headteacher/ Principal is the ultimate decision maker in respect of low-level concerns.** All low-level concerns must be shared with the Headteacher/Principal or the DSL. The **DSL must inform the Headteacher/Principal** of all the low-level concerns, in a timely fashion according to the nature of each particular low-level concern.

If there are concerns about the Headteacher/Principal these concerns should be referred to a senior member of the Group (such as the Regional Director/Operations Director, Managing Director, Chief Operating Officer or Chief Executive Officer). If there is a conflict of interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or local equivalent.

25.3 Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

25.4 Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any child or young person may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher/ Principal should decide on an appropriate course of action.

25.5 Where there are **three or more recorded low-level concerns** in relation to the same team member, the Headteacher/Principal must notify HR peopleadvice@ofgl.co.uk so the collective concerns can be reviewed and further action taken as required. Advice and support can also be sought from safeguarding@ofgl.co.uk All reviews must be clearly recorded on HR file and on the low-level concern log.

26.0 Working with the Local Authority Designated Officer or local equivalent

In all referrals, the DSL is the lead professional within the setting for ensuring that a timely response is received from the local authority. If a response is received which the DSL believes is inappropriate and does not prioritise the student's safety, this must be escalated to the Headteacher/Principal or Governors to agree further action.

27.0 Whistleblowing

27.1 We recognise that on occasion team members may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. We also recognise that students will be unable to voice their concerns if they are in an environment where team members do not feel able to voice their concerns.

27.2 Team members have a duty first and foremost to the students in their school/college. Any concerns, regardless of how small they may seem, must be reported. DSLs and Headteachers/Principal have a responsibility to ensure that they create an environment where team members feel safe to openly voice any concerns, challenge unsafe practice and feel listened to. It is also important that team members feel supported if concerns are raised about them. If team members see or hear about other colleagues' practice or behaviour which they are concerned about, which potentially may cause emotional or physical harm to a student, or if the standard of care being provided falls short of expectations, they must report this.

27.3 The Group has an anonymous telephone support system (Safecall) where team members are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such. Team members can call Safecall on **08009151571**, report online Safecall or email outcomesfirstgroup@safecall.co.uk

28.0 Alternative provision and work experience placements

Where a student attends alternative provision e.g. college, horse-riding centre etc or a work experience placement, the school/college continues to be responsible for the safeguarding of that student. The school/college must be satisfied that the provision/ placement is appropriate, has sufficient safeguarding arrangements in place and is able to meet the individual's needs.

28.1 Alternative Provision

Schools and colleges should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school/college would otherwise perform in respect of its own team members. This includes written confirmation that the alternative provider will inform the school/college of any arrangements that may put the student at risk, such as, staff changes, so that the school/college is assured that appropriate safeguarding checks have been carried out. The school/college will monitor the ongoing suitability and safeguarding effectiveness of alternative provision.

Please also see the *Alternative Provision Policy* and the DfE's statutory guidance to which schools and colleges must have regard to:

- Alternative Provision and
- Education for children with health needs who cannot attend school

DFE has also published voluntary national standards for Non-school alternative provision: voluntary national standards

28.2 Work Experience

Where adults supervise students on work experience, the school/ college must assess whether the activity is regulated activity and determine what safer recruitment, vetting, supervision and written assurance arrangements are required. This assessment must take account of the nature of the placement, frequency, level of supervision, age and needs of the student, and any additional vulnerabilities.

Students aged under 16 must be supervised by an Enhanced DBS checked adult whilst at the work placement OR must accompanied by an Outcomes First Group team member in the place of work at all times.

The school/college is responsible for ensuring that there are appropriate safeguarding arrangements in place for young people aged 16 and over when on work experience placements. This includes regular check-ins and daily calls from young people.

Please also see the Work Experience Policy

29.0 Digital and Remote Learning

Where digital learning and remote learning options are provided for students, all team members should be mindful that the **safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply at all times when working online or offline at any location.**

29.1 Data protection and GDPR considerations must be taken into account. This includes rules on signing students up to online services, and team members accessing personal data when working at home. It is recommended that team members are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from the school/college or remotely.

29.2 The guidelines for digital leaning below must be followed:

- Ensure parents/ carers are aware of online safety advice and resources such as Thinkuknow and Safer Internet Centre , Net-aware , Digital Parenting Pro
- If team members are concerned about a comment made online by a /student or the work they share, the team member should report it to the DSL.
- Team members and students should be fully dressed and take into account the background/ surroundings. Team members should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet used.
- The teacher may need to give guidance to students to remove items from view. If a student is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.
- Team members must not enter into one-to-one tuition voice or video call with an individual student without SLT agreement. If there is a need for single student interaction, please ensure that a colleague is added to the call, or that a parent is present with the student.
- If a team member urgently needs to call a parent or student from their personal phone, the number must be withheld by dialling 141 first and a record of the call must made e.g. an email to the Headteacher, Principal or DSL to explain the purpose of the call and any actions taken as a result of it.
- Home filters may block different content at a different level to the school's/college's filtering software; if this appears to be the case for one student in the group the teacher should revert to or suggest an alternative resource.

- Take care that any material provided to students to watch is age and developmentally appropriate. For instance, do not ask Year 9 students to watch a film with a 15 rating.
- Team members should model good online behaviour in all ways, including the language used to interact with students and colleagues, which should be respectful at all times.
- School and college leaders should make clear to team members the operating times for online learning (for example, only during the normal school day); no team member should engage with or respond to a student outside these times.
- Clear guidelines for connecting to a virtual classroom session will be given by the school/college, and the teacher will check their understanding.
- The same principles apply to virtual meetings between team members and parents as face-to-face meetings.

Further helpful resources for digital learning:

- DfE advice: teaching online safety in schools
- UKCIS: Education for a connected world and External visitors' guidance

30.0 Home visits

Where team members need to make home visits, they should be mindful of their own wellbeing and safety if conducting visits to the homes of students and their families. Team members must follow the ***Lone Working Policy*** and any local procedures and guidance, including informing at least one other team member of their whereabouts and the time they plan to return to the school/college. Wherever possible, arrange for a colleague to accompany you. This is particularly important for visiting households with identified risks to the safety of professionals. You should discuss and assess those risks with the appropriate local authority.

31.0 Policy Review

This policy will be reviewed annually, as a minimum to ensure it is kept up to date with safeguarding issues as they emerge and evolve. Where necessary, updates will be made during the year.



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